

Pennsylvania Gaming Control Board

SLOT OPERATOR AND MANAGEMENT COMPANY- APPLICATION AND DISCLOSURE INFORMATION FORM

Endeka Entertainment, L.P.

INSTRUCTIONS

PENNSYLVANIA GAMING IS GOVERNED BY THE LAWS SET FORTH IN 4 PA.C.S. PART II, ENACTED BY THE ACT OF JULY 5, 2004 (P.L. 572, NO. 71), THE PENNSYLVANIA RACE HORSE DEVELOPMENT AND GAMING ACT (ACT), AS AMENDED, AND 58 PA. CODE PART VII, PENNSYLVANIA GAMING CONTROL BOARD (REGULATIONS).

THESE INSTRUCTIONS ARE APPLICABLE TO ANY "PERSON" SEEKING TO BE LICENSED AS A CONDITIONAL CATEGORY 1, CATEGORY 1, CATEGORY 2, CATEGORY 3 SLOT MACHINE OPERATOR (COLLECTIVELY REFERRED TO HEREFTER AS SLOT OPERATOR) OR MANAGEMENT COMPANY. PLEASE BE ADVISED THAT NO PERSON, ITS AFFILIATE, INTERMEDIARY, SUBSIDIARY OR HOLDING COMPANY THAT HAS APPLIED FOR OR IS A HOLDER OF A SLOT MACHINE LICENSE, SHALL BE ELIGIBLE TO APPLY FOR OR HOLD A SUPPLIER OR MANUFACTURER LICENSE.

AS USED IN THESE INSTRUCTIONS, THE PHRASE "AFFILIATED ENTITIES" SHALL MEAN A SLOT OPERATOR'S OR MANAGEMENT COMPANY'S AFFILIATES, INTERMEDIARIES, SUBSIDIARIES AND HOLDING COMPANIES. SLOT MACHINE OPERATORS ARE SUBJECT TO THE REQUIREMENTS OF §§1302 AND 1303 (EXCLUSIVELY FOR CATEGORY 1), 1304 (EXCLUSIVELY FOR CATEGORY 2), 1305 (EXCLUSIVELY FOR CATEGORY 3) AND 1309 (ALL CATEGORIES) OF THE ACT. CONDITIONAL CATEGORY 1 SLOT MACHINE LICENSES ARE SUBJECT TO THE REQUIREMENTS OF §1315 OF THE ACT.

THE ORIGINAL FORM, ONE PAPER COPY, AND ONE (1) COMPACT DISC (CD) CONTAINING ALL FORMS MUST BE SENT TO THE PENNSYLVANIA GAMING CONTROL BOARD, BUREAU OF LICENSING, 303 WALNUT STREET, FIFTH FLOOR, VERIZON TOWER, HARRISBURG, PENNSYLVANIA 17101 WITH THE APPROPRIATE FEE. PLEASE REFER TO THE LICENSING SECTION OF THE BOARD'S WEBSITE FOR CD FORMATTING REQUIREMENTS.

1. SLOT OPERATOR AND MANAGEMENT COMPANY

THE FORMS THAT MAKE UP AN APPLICATION PACKAGE FOR A SLOT OPERATOR OR MANAGEMENT COMPANY LICENSE ARE AS FOLLOWS:

A. SLOT OPERATOR AND MANAGEMENT COMPANY APPLICATION AND DISCLOSURE INFORMATION FORM (TO BE COMPLETED BY APPLICANT AND EACH OF APPLICANT'S AFFILIATED ENTITIES).

B. REQUEST FOR USE OF ALTERNATIVE CONDITIONAL/CATEGORY 1 LICENSING STANDARDS FORM - ADDENDUM 1 (FOR CATEGORY 1 APPLICANTS SEEKING USE OF ALTERNATIVE LICENSING STANDARDS)

(COMPLETE THIS FORM IF YOU ARE A CONDITIONAL/CATEGORY 1 APPLICANT AND ARE REQUESTING THAT THE BOARD UTILIZE THE LICENSE APPLICATION PACKAGE FILED IN AND LICENSE ISSUED BY ANOTHER JURISDICTION PURSUANT TO §1314 OF THE ACT. IF THE BOARD DETERMINES THAT THE LICENSING STANDARDS OF THE OTHER JURISDICTION ARE COMPREHENSIVE AND THOROUGH AND PROVIDE SIMILAR ADEQUATE SAFEGUARDS TO THOSE IN THE ACT, ONLY UPDATED INFORMATION FROM THE DATE OF FILING THE APPLICATION IN THE OTHER JURISDICTION MAY BE NECESSARY. THE CONDITIONAL/CATEGORY 1 APPLICANT MAY BE ASKED TO SUBMIT PROOF THAT THE LICENSING STANDARDS OF THE OTHER JURISDICTION ARE COMPREHENSIVE AND THOROUGH AND PROVIDE SIMILAR ADEQUATE SAFEGUARDS).

C. MULTI-JURISDICTIONAL PERSONAL HISTORY DISCLOSURE FORM (MULTI-JURISDICTIONAL PHD)
(TO BE COMPLETED BY EACH NATURAL PERSON WHO IS A PRINCIPAL OR KEY EMPLOYEE AS DEFINED IN 58 PA. CODE §401A.3) AND IDENTIFIED IN SCHEDULES 1, 5, 10, 10A, 11, 13, 15 AND 18).

D. PRINCIPAL/KEY EMPLOYEE FORM - PENNSYLVANIA SUPPLEMENT TO THE MULTI-JURISDICTIONAL PERSONAL HISTORY DISCLOSURE FORM (PA SUPPLEMENT)

(TO BE COMPLETED BY EACH NATURAL PERSON WHO IS A PRINCIPAL OR KEY EMPLOYEE IDENTIFIED IN SCHEDULES 1, 5, 10, 10A, 11, 13, 15 AND 18).

E. PRINCIPAL ENTITY FORM

(TO BE COMPLETED BY EACH ENTITY THAT IS A PRINCIPAL IDENTIFIED IN SCHEDULES 10, 10A, 11, 13, 15 AND 18).

2. APPLICATION AND LICENSING FEES

A. APPLICATION FEES AND INVESTIGATION DEPOSITS

APPLICATION FEES MUST BE SUBMITTED WITH THE APPLICATION PACKAGE. THESE FEES ARE NON-REFUNDABLE DEPOSITS THAT WILL BE USED BY THE BOARD TO PROCESS AND INVESTIGATE THE SLOT OPERATOR OR MANAGEMENT COMPANY APPLICANT AND THE APPLICANT'S AFFILIATED ENTITIES AND PERSONS FILING FORMS AS PART OF THE APPLICATION PACKAGE. APPLICATION FEES MUST BE SUBMITTED FOR EACH APPLICANT, AFFILIATED ENTITY AND PERSON, UNLESS OTHERWISE NOTED.

THERE MAY BE ADDITIONAL COSTS AND EXPENSES INCURRED BY THE BOARD IN ITS PROCESSING AND INVESTIGATION OF THE SLOT OPERATOR OR MANAGEMENT COMPANY APPLICANT AND THE APPLICANT'S AFFILIATED ENTITIES AND PERSONS. THE SLOT OPERATOR OR MANAGEMENT COMPANY APPLICANT MUST REIMBURSE THE BOARD FOR ALL ADDITIONAL COSTS AND EXPENSES RELATED TO THE PROCESSING AND INVESTIGATION OF THEIR APPLICATION PACKAGE.

SLOT OPERATOR OR MANAGEMENT COMPANY APPLICANT	\$5,000.00
APPLICANT'S AFFILIATED ENTITIES	\$2,500.00
PRINCIPAL/KEY EMPLOYEES	\$2,500.00
PRINCIPAL ENTITY	\$2,500.00

B. LICENSING FEES

LICENSING FEES MUST BE PAID PRIOR TO ISSUANCE OF THE LICENSE.

CATEGORY 1 SLOT MACHINE LICENSE	\$50,000,000.00
CATEGORY 2 SLOT MACHINE LICENSE	\$50,000,000.00
CATEGORY 3 SLOT MACHINE LICENSE	\$5,000,000.00
CATEGORY 1 OR 2 MANAGEMENT COMPANY LICENSE	\$1,500,000/3 YEAR LICENSE
CATEGORY 3 MANAGEMENT COMPANY LICENSE	\$150,000/3 YEAR LICENSE

3. APPLICATION FORM INSTRUCTIONS

GENERALLY

AS USED IN THE SLOT OPERATOR OR MANAGEMENT COMPANY FORM, THE WORDS "APPLICANT" AND "YOU" SHALL MEAN THE SLOT OPERATOR OR MANAGEMENT COMPANY APPLICANT. WHEN APPLICANT'S AFFILIATED ENTITIES ARE COMPLETING THE FORM, "APPLICANT" AND "YOU" SHALL REFER TO THE AFFILIATED ENTITY COMPLETING THE FORM.

ALL ENTRIES ON THE FORM MUST BE TYPED OR PRINTED IN BLOCK LETTERING. INITIALS AND SIGNATURES MUST BE HANDWRITTEN BY THE PERSON PROVIDING THE INFORMATION. IF THE ANSWERS ARE NOT LEGIBLE, THE APPLICATION MAY NOT BE ACCEPTED.

READ EACH QUESTION CAREFULLY PRIOR TO ANSWERING. ANSWER EVERY QUESTION COMPLETELY. DO NOT LEAVE BLANK SPACES. IF A QUESTION DOES NOT APPLY TO THE APPLICANT, WRITE "DOES NOT APPLY" IN RESPONSE TO THAT QUESTION. IF A SCHEDULE OR ADDENDUM DOES NOT APPLY TO THE APPLICANT, WRITE "DOES NOT APPLY" ON THE SCHEDULE OR ADDENDUM.

APPENDICES ARE TO BE PROVIDED BY THE APPLICANT. THE REQUIRED APPENDICES ARE LISTED ON THE APPLICATION CHECKLIST. APPENDICES MUST BE PRESENTED IN A TABBED MANNER. EACH TAB MUST INDICATE THE APPENDIX NUMBER. IMMEDIATELY FOLLOWING THE TAB, APPLICANT MUST INSERT A PAGE WITH THE APPENDIX NUMBER AND ALL INFORMATION APPLICABLE TO THE APPENDIX. IF AN APPENDIX DOES NOT APPLY TO THE APPLICANT, WRITE "DOES NOT APPLY" ON THE APPENDIX PAGE.

ALL PAGES OF THE FORM MUST BE INITIALED BY THE APPLICANT, OR IF THE APPLICANT IS NOT A NATURAL PERSON, THE PERSON AUTHORIZED TO COMPLETE THE FORM ON BEHALF OF THE APPLICANT MUST INITIAL EACH PAGE. IF ADDITIONAL PAGES ARE REQUIRED IN ORDER TO ANSWER ANY QUESTION, ADDITIONAL PAGES MAY BE UTILIZED AND MUST BE ATTACHED TO THE FORM. BE SURE TO INDICATE THE NUMBER(S) OF THE QUESTION(S) BEING ANSWERED AND INITIAL EACH ADDITIONAL PAGE. SOME SCHEDULES MAY REQUIRE DISCLOSURE OF INFORMATION FOR MORE THAN ONE NATURAL PERSON OR ENTITY OR TYPE OF INFORMATION. IF THERE ARE MULTIPLE DISCLOSURES, MAKE ENOUGH ADDITIONAL COPIES OF THE BLANK SCHEDULE AND COMPLETE IT FOR EACH NATURAL PERSON OR ENTITY OR TYPE OF INFORMATION.

ALL REQUIRED DOCUMENTATION, SUCH AS BUSINESS FORMATION PAPERS, TAX RETURNS AND APPENDICES, AS WELL AS THE APPLICATION FORMS THAT COMPRISE AN APPLICATION PACKAGE FOR A SLOT OPERATOR OR MANAGEMENT COMPANY LICENSE, AS LISTED ABOVE, MUST BE SUBMITTED AT THE TIME OF FILING THIS FORM. FURTHER, PURSUANT TO 58 PA. CODE §§421A.1(G) AND 423A.1(E), THE APPLICANT IS UNDER A CONTINUING DUTY TO PROMPTLY NOTIFY THE BOARD IF THERE IS A CHANGE IN THE INFORMATION PROVIDED TO THE BOARD.

ADDITIONAL FINANCIAL INFORMATION WILL BE REQUESTED AS NEEDED.

SHOULD YOU BE UNABLE TO UNDERSTAND THIS FORM FULLY IN ENGLISH, IT IS YOUR RESPONSIBILITY TO ACQUIRE ADEQUATE MEANS OF TRANSLATION. IF YOU SUBMIT A DOCUMENT TO THE BOARD THAT IS IN A LANGUAGE OTHER THAN ENGLISH, YOU MUST ALSO SUBMIT AN ENGLISH TRANSLATION COMPLIANT WITH 58 PA. CODE §423A.1(H).

ALL NOTICES REGARDING YOUR APPLICATION WILL BE SENT TO THE ADDRESS YOU PROVIDE ON THIS FORM. YOU MUST IMMEDIATELY NOTIFY THE BOARD IF YOU CHANGE YOUR ADDRESS.

FAILURE TO ANSWER ANY QUESTION COMPLETELY AND TRUTHFULLY WILL RESULT IN DENIAL OF YOUR APPLICATION AND/OR REVOCATION OF YOUR LICENSE, REGISTRATION, CERTIFICATE OR PERMIT AND MAY SUBJECT YOU TO CRIMINAL PENALTIES UNDER 18 PA.C. S. A. §4903.

ANY PERSON WHO APPLIES FOR AND OBTAINS A LICENSE, REGISTRATION, CERTIFICATE OR PERMIT FROM THE BOARD MAY BE REQUIRED TO SUBMIT TO WARRANTLESS SEARCHES WHEN PRESENT IN A LICENSED GAMING FACILITY PURSUANT TO THE ACT.

CONFIDENTIAL INFORMATION (AS DEFINED IN 58 PA. CODE §401A.3) SUPPLIED TO THE BOARD OR OTHERWISE OBTAINED SHALL NOT BE REVEALED EXCEPT IN THE COURSE OF THE NECESSARY ADMINISTRATION OF THE ACT, OR UPON THE LAWFUL ORDER OF A COURT OF COMPETENT JURISDICTION OR, WITH THE APPROVAL OF THE ATTORNEY GENERAL, TO A DULY AUTHORIZED LAW ENFORCEMENT AGENCY. AN APPLICANT OR LICENSE, REGISTRATION, CERTIFICATE OR PERMIT HOLDER WAIVES ANY LIABILITY OF THE COMMONWEALTH OF PENNSYLVANIA AND ITS INSTRUMENTALITIES AND AGENTS FOR ANY DAMAGES RESULTING FROM ANY DISCLOSURE OR PUBLICATION IN ANY MANNER, OTHER THAN A WILLFULLY UNLAWFUL DISCLOSURE OR PUBLICATION.

PURSUANT TO 58 PA. CODE §423A.5, ONCE THE APPLICATION HAS BEEN FILED, THE APPLICANT MAY ONLY WITHDRAW ITS APPLICATION BY FILING A PETITION WITH THE BOARD SEEKING PERMISSION TO WITHDRAW.

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A LICENSE, PERMIT, CERTIFICATION OR REGISTRATION ISSUANCE, RENEWAL OR OTHER AUTHORIZATION ISSUED BY THE BOARD IS A REVOCABLE PRIVILEGE. NO PERSON HOLDING A LICENSE, PERMIT, CERTIFICATION OR REGISTRATION, RENEWAL, OR OTHER AUTHORIZATION IS DEEMED TO HAVE ANY PROPERTY RIGHTS RELATED TO THE LICENSE, PERMIT, CERTIFICATION OR REGISTRATION.

AN APPLICATION THAT HAS BEEN ACCEPTED FOR FILING AND ALL RELATED MATERIALS SUBMITTED TO THE BOARD BECOME THE PROPERTY OF THE BOARD AND WILL NOT BE RETURNED TO THE APPLICANT.

THIS IS AN APPLICATION FOR A SLOT MACHINE OR MANAGEMENT COMPANY LICENSE. AN ENTITY INTERESTED IN OFFERING TABLE GAMES MUST FIRST OBTAIN A SLOT MACHINE LICENSE IN ORDER TO BE ELIGIBLE TO FILE A PETITION SEEKING AUTHORIZATION TO CONDUCT TABLE GAMES. ANY REFERENCES TO TABLE GAMES IN THIS APPLICATION ARE FOR INFORMATIONAL PURPOSES ONLY.

IF YOU HAVE ANY QUESTIONS REGARDING THE APPLICATION PACKAGE FORMS OR THE INFORMATION REQUIRED TO COMPLETE ANY APPLICATION, PLEASE CONTACT THE PENNSYLVANIA GAMING CONTROL BOARD - BUREAU OF LICENSING AT (717) 346-8300.

SLOT OPERATOR OR MANAGEMENT COMPANY APPLICANT	
INSERT THE NUMBER OF EACH OF THE FOLLOWING FORMS INCLUDED IN THIS APPLICATION PACKAGE	
<input type="checkbox"/>	SLOT OPERATOR OR MANAGEMENT COMPANY DISCLOSURE INFORMATION FORM (FOR APPLICANT AND EACH OF APPLICANT'S AFFILIATED ENTITIES).
<input type="checkbox"/>	REQUEST FOR USE OF ALTERNATIVE CONDITIONAL/CATEGORY 1 LICENSING STANDARDS - ADDENDUM I (FOR CONDITIONAL/CATEGORY 1 APPLICANT REQUESTING THAT THE BOARD UTILIZE THE APPLICATION FILED IN AND LICENSE ISSUED BY ANOTHER JURISDICTION).
<input type="checkbox"/>	MULTI - JURISDICTIONAL PERSONAL HISTORY DISCLOSURE FORM (MULTI - JURISDICTIONAL PHD) (FOR EACH NATURAL PERSON WHO IS A PRINCIPAL OR KEY EMPLOYEE).
<input type="checkbox"/>	PRINCIPAL/KEY EMPLOYEE FORM - PENNSYLVANIA SUPPLEMENT TO THE MULTI - JURISDICTIONAL PERSONAL HISTORY DISCLOSURE FORM (PA SUPPLEMENT) (FOR EACH NATURAL PERSON WHO IS A PRINCIPAL OR KEY EMPLOYEE).
<input type="checkbox"/>	PRINCIPAL ENTITY FORM (FOR EACH ENTITY THAT IS A PRINCIPAL).

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APPLICANT INFORMATION

APPLICANT'S BUSINESS NAME			
BUSINESS NAME AS IT APPEARS ON APPLICANT'S CERTIFICATE OF INCORPORATION, CHARTER, BYLAWS, PARTNERSHIP AGREEMENT OR OTHER OFFICIAL DOCUMENTS (SPELL OUT COMPLETE NAME, DO NOT USE ABBREVIATIONS)			
Endeka Entertainment, L.P.			
TRADE NAME(S) AND DOING BUSINESS AS ("DBA") NAMES			
Does Not Apply			
IS THE APPLICANT A MINORITY OR WOMEN'S BUSINESS ENTERPRISE THAT IS CERTIFIED BY THE BUREAU OF MINORITY AND WOMEN'S BUSINESS OPPORTUNITIES OF THE DEPARTMENT OF GENERAL SERVICES? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
IF YES, PROVIDE ENTERPRISE CERTIFICATION NUMBER. _____			
APPLICANT'S PRINCIPAL ADDRESS			
ADDRESS LINE 1			
1111 West DeKalb Pike			
ADDRESS LINE 2			
ADDRESS LINE 3			
CITY		STATE/PROVINCE	POSTAL CODE
Wayne		PA	19087
COUNTRY		EMAIL ADDRESS	
U.S.A.			
COUNTY	TOWNSHIP	WEB URL	
Delaware	Radnor		
PHONE NUMBER ()		FAX NUMBER ()	
(570) 346-7651		(570) 344-1542	
APPLICANT'S ADDRESS IN PENNSYLVANIA (IF APPLICABLE)			
ADDRESS LINE 1			
Same As Above			
ADDRESS LINE 2			
ADDRESS LINE 3			
CITY		STATE/PROVINCE	POSTAL CODE
COUNTRY		EMAIL ADDRESS	
COUNTY	TOWNSHIP	WEB URL	
PHONE NUMBER ()		FAX NUMBER ()	
CONTACT NAME FOR THIS APPLICATION			
FIRST NAME	MIDDLE NAME	LAST NAME	SUFFIX (JR., SR., ETC.)
James	A.	Doherty	III
TITLE		INDIVIDUAL EMAIL ADDRESS	
Counsel		Redacted	
PHONE NUMBER ()		FAX NUMBER ()	
Redacted		Redacted	
APPLICANT'S FORM OF ORGANIZATION			
CHECK ONE			
<input type="checkbox"/> SOLE PROPRIETORSHIP	<input type="checkbox"/> PARTNERSHIP	<input type="checkbox"/> LIMITED PARTNERSHIP	<input type="checkbox"/> C-CORPORATION
<input type="checkbox"/> LIMITED LIABILITY COMPANY	<input type="checkbox"/> S-CORPORATION	<input type="checkbox"/> TRUST	
<input type="checkbox"/> OTHER (DESCRIBE) _____			

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APPLICANT'S ORGANIZATION DOCUMENTS			
STATE OF INCORPORATION, REGISTRATION OR OTHER TYPE OF FORMATION Pennsylvania			DATE OF FORMATION April 3, 2012
APPLICANT'S BUSINESS NAME AS IT APPEARS ON THE FORMATION DOCUMENTS Endeka Entertainment, LP			
LIST ALL STATES IN WHICH THE APPLICANT IS CURRENTLY REGISTERED OR AUTHORIZED TO DO BUSINESS Pennsylvania			
COMPLETE <u>SCHEDULE 1</u> CONCERNING APPLICANT'S INCORPORATORS/FOUNDERS			
IS APPLICANT REGISTERED OR AUTHORIZED TO DO BUSINESS IN THE COMMONWEALTH OF PENNSYLVANIA? <input type="checkbox"/> Yes <input type="checkbox"/> No			
APPLICANT'S IDENTIFICATION NUMBERS			
Redacted			PA UNEMPLOYMENT COMPENSATION ACCOUNT NUMBER Redacted
			PA LIQUOR CONTROL BOARD LICENSE NUMBER Does Not Apply
			PA DEPARTMENT OF STATE - ENTITY NUMBER 4099425
			DOES THE APPLICANT HAVE ANY OUTSTANDING TAX LIABILITIES TO EITHER THE COMMONWEALTH OF PENNSYLVANIA OR ANY OTHER STATE, LOCALITY OR THE FEDERAL GOVERNMENT? Redacted
IF YOU ANSWER YES, PROVIDE DETAILS CONCERNING ALL OUTSTANDING TAX LIABILITIES.			
APPLICANT'S BILLING CONTACT INFORMATION			
FIRST NAME James	LAST NAME Doherty	SUFFIX (JR., SR., ETC.) III	
TITLE Counsel		INDIVIDUAL EMAIL ADDRESS Redacted	
ADDRESS 217 Wyoming Avenue			
CITY Scranton	STATE/PROVINCE PA	POSTAL CODE 18503	
PHONE NUMBER () (570) 346-7651		FAX NUMBER () (570) 344-0359	
TYPE OF LICENSE/APPLICANT IS SEEKING			
<input type="checkbox"/> CONDITIONAL CATEGORY 1		<input type="checkbox"/> CONDITIONAL CATEGORY 1 AFFILIATE	
<input checked="" type="checkbox"/> CATEGORY 1		<input type="checkbox"/> CATEGORY 1 AFFILIATE	
<input type="checkbox"/> CATEGORY 2		<input type="checkbox"/> CATEGORY 2 AFFILIATE	
<input type="checkbox"/> CATEGORY 3		<input type="checkbox"/> CATEGORY 3 AFFILIATE	
<input type="checkbox"/> MANAGEMENT COMPANY		<input type="checkbox"/> MANAGEMENT COMPANY AFFILIATE	
CRIMINAL HISTORY			
THE NEXT SECTION ASKS ABOUT ANY OFFENSES OR CHARGES APPLICANT OR ANY OF ITS PRINCIPALS' OR KEY EMPLOYEES MAY HAVE COMMITTED OR HAD FILED AGAINST THEM. PRIOR TO ANSWERING THIS QUESTION, CAREFULLY REVIEW THE DEFINITIONS AND INSTRUCTIONS THAT FOLLOW.			
DEFINITIONS	FOR PURPOSES OF THIS SECTION:		
	A. "CRIME OR OFFENSE" INCLUDES ALL FELONIES AND MISDEMEANORS, AS WELL AS SUMMARY OFFENSES THAT MAY HAVE REQUIRED YOU TO APPEAR BEFORE A LAW ENFORCEMENT AGENCY, STATE OR FEDERAL GRAND JURY, JUSTICE COURT, MUNICIPAL COURT, CITY COURT, MILITARY COURT OR ANY OTHER COURT EXCEPT JUVENILE COURT. INCLUDE ALL DUI/DWI OFFENSES.		
	B. "ARREST" INCLUDES ANY TIME THAT YOU WERE STOPPED BY A POLICE OFFICER OR OTHER LAW ENFORCEMENT OFFICER AND ADVISED THAT YOU WERE UNDER		

	<p>ARREST, DETAINED, HELD FOR QUESTIONING, REQUESTED BY A POLICE OFFICER OR LAW ENFORCEMENT OFFICER TO COME TO A POLICE STATION AND ANSWER QUESTIONS, TAKEN INTO CUSTODY BY ANY POLICE OFFICER OR OTHER LAW ENFORCEMENT OFFICER, FINGERPRINTED, HELD IN JAIL, OR INSTRUCTED TO APPEAR IN COURT OR SUBPOENAED TO ANSWER FOR CONDUCT WHICH IS A CRIME AS HAS BEEN DEFINED IN PARAGRAPH "A."</p> <p>C. "CHARGE" INCLUDES ANY INDICTMENT, COMPLAINT, INFORMATION, SUMMONS, CITATION OR OTHER NOTICE OF THE ALLEGED COMMISSION OF ANY CRIME OR OFFENSE AS DEFINED IN PARAGRAPH "A."</p>
INSTRUCTIONS	<p>1. ANSWER "YES" AND PROVIDE ALL INFORMATION TO THE BEST OF YOUR ABILITY EVEN IF:</p> <p>A. YOU DID NOT COMMIT THE OFFENSE CHARGED;</p> <p>B. THE ARREST OR CHARGES WERE DISMISSED OR THE CHARGES WERE SUBSEQUENTLY DOWNGRADED TO A LESSER CHARGE;</p> <p>C. YOU PLEADED NOT GUILTY OR NOLO CONTENDERE;</p> <p>D. YOU COMPLETED AN ACCELERATED REHABILITATIVE DISPOSITION ("ARD") OR EQUIVALENT DIVERSIONARY PROGRAM;</p> <p>E. THE CHARGES OR CONVICTION WERE EXPUNGED FROM YOUR RECORD, EVEN IF YOU HAVE EXPUNGEMENT PAPERS;</p> <p>F. YOU WERE NOT CONVICTED OR WERE FOUND "NOT GUILTY"</p> <p>G. YOU DID NOT SERVE ANY TIME IN PRISON OR JAIL;</p> <p>H. THE ARRESTS, CHARGES OR OFFENSES HAPPENED A LONG TIME AGO;</p> <p>I. YOU WERE ARRESTED OR CHARGED IN ANOTHER STATE (A STATE OTHER THAN PENNSYLVANIA);</p> <p>J. YOU WERE NEVER PHYSICALLY TAKEN INTO CUSTODY AND/OR TRANSPORTED TO A POLICE STATION OR JAIL.</p> <p>2. ANSWER "NO" IF:</p> <p>A. YOU HAVE NEVER BEEN ARRESTED OR CHARGED WITH ANY CRIME OR OFFENSE;</p> <p>B. YOUR ARREST HAPPENED WHEN YOU WERE UNDER 18 YEARS OF AGE AND YOUR COURT APPEARANCE WAS IN JUVENILE COURT.</p> <p>FAILURE TO FULLY ANSWER THIS QUESTION MAY RESULT IN THE DENIAL OF YOUR APPLICATION.</p>
1. HAS APPLICANT OR ANY OF ITS PRINCIPALS OR KEY EMPLOYEES EVER BEEN INDICTED, CHARGED WITH OR CONVICTED OF A CRIMINAL OFFENSE OR BEEN A PARTY TO OR NAMED AS AN UNINDICTED CO-CONSPIRATOR IN ANY CRIMINAL PROCEEDING IN THE COMMONWEALTH OR ANY OTHER JURISDICTION?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
1. A. HAS APPLICANT OR ANY OF ITS PRINCIPALS OR KEY EMPLOYEES EVER BEEN CONVICTED OF A FELONY?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
1. B. HAS APPLICANT OR ANY OF ITS PRINCIPALS OR KEY EMPLOYEES EVER BEEN CONVICTED OF A MISDEMEANOR OR GAMBLING OFFENSE?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
IF YOU ANSWER YES TO ANY OF THESE QUESTIONS, YOU MUST COMPLETE <u>SCHEDULE 23</u> CONCERNING CRIMINAL HISTORY.	
TESTIMONY, INVESTIGATIONS OR POLYGRAPHS	
2. HAS APPLICANT OR ANY OF ITS PRINCIPALS OR KEY EMPLOYEES EVER BEEN CALLED TO	Redacted

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<p>TESTIFY BEFORE, BEEN THE SUBJECT OF AN INVESTIGATION CONDUCTED BY, OR REQUESTED TO TAKE A POLYGRAPH EXAM BY ANY GOVERNMENTAL AGENCY, COURT, COMMITTEE, GRAND JURY OR INVESTIGATORY BODY (MUNICIPAL, STATE, COUNTY, PROVINCIAL, FEDERAL, NATIONAL, ETC.) OTHER THAN IN RESPONSE TO MINOR TRAFFIC RELATED OFFENSES?</p> <p>IF YOU ANSWER YES, YOU MUST COMPLETE <u>SCHEDULE 24</u> CONCERNING TESTIMONY, INVESTIGATIONS OR POLYGRAPHS.</p>		
<p>ANTITRUST, TRADE REGULATION & SECURITIES JUDGMENTS, STATUTORY AND REGULATORY VIOLATIONS</p>		
<p>3. HAS APPLICANT, OR ANY OF ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES OR HOLDING COMPANIES EVER HAD A JUDGMENT, ORDER, CONSENT DECREE OR CONSENT ORDER PERTAINING TO A VIOLATION OR ALLEGED VIOLATION OF THE FEDERAL ANTITRUST, TRADE REGULATION OR SECURITIES LAWS, OR SIMILAR LAWS OF ANY STATE, PROVINCE OR COUNTRY ENTERED AGAINST IT?</p>		<p><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p>
<p>4. IN THE PAST TEN (10) YEARS, HAS APPLICANT, OR ANY OF ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES OR HOLDING COMPANIES HAD A JUDGMENT, ORDER, CONSENT DECREE OR CONSENT ORDER PERTAINING TO ANY STATE OR FEDERAL STATUTE, REGULATION OR CODE THAT RESULTED IN A FINE OR PENALTY OF \$50,000 OR MORE ENTERED AGAINST IT?</p> <p>IF YOU ANSWER YES TO EITHER QUESTION, YOU MUST COMPLETE <u>SCHEDULE 26</u> CONCERNING ANTITRUST, TRADE REGULATION & SECURITY JUDGMENTS, STATUTORY AND REGULATORY VIOLATIONS.</p>		<p><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p>
<p>BANKRUPTCY OR INSOLVENCY PROCEEDINGS</p>		
<p>5. HAS APPLICANT, OR ANY OF ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES OR HOLDING COMPANIES HAD ANY PETITION UNDER ANY PROVISION OF THE FEDERAL BANKRUPTCY CODE OR UNDER ANY STATE INSOLVENCY LAW FILED BY OR AGAINST IT IN THE LAST TEN (10) YEAR PERIOD?</p>		<p><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p>
<p>6. HAS APPLICANT, OR ANY OF ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES OR HOLDING COMPANIES SOUGHT RELIEF UNDER ANY PROVISION OF THE FEDERAL BANKRUPTCY CODE OR UNDER ANY STATE INSOLVENCY LAW IN THE LAST TEN (10) YEAR PERIOD?</p>		<p><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p>
<p>7. HAS A COURT APPOINTED ANY RECEIVER, FISCAL AGENT, TRUSTEE, REORGANIZATION TRUSTEE, OR SIMILAR OFFICER FOR APPLICANT, OR ANY OF ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES OR HOLDING COMPANIES IN THE LAST TEN (10) YEARS?</p>		<p><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p>
<p>IF YOU ANSWER YES TO ANY OF THESE QUESTIONS, YOU MUST COMPLETE <u>SCHEDULE 27</u> CONCERNING BANKRUPTCY OR INSOLVENCY PROCEEDINGS.</p>		
<p>APPLICANT'S LICENSES AND PERMITS</p>		
<p>8. HAS APPLICANT, OR ANY OF ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES OR HOLDING COMPANIES APPLIED FOR ANY LICENSE OR PERMIT BY A GOVERNMENT AGENCY FOR THE COLLECTION OF SALES AND USE TAX, SELLING AND SERVING LIQUOR AND MALT BEVERAGES, PROVIDING OVERNIGHT LODGING SERVICES OR ANY OTHER ACTIVITY REQUIRING A LICENSE OR PERMIT? A GOVERNMENT AGENCY AS USED HERE INCLUDES ANY SUBORDINATE CREATURE OF FEDERAL, STATE, NATIVE AMERICAN OR LOCAL GOVERNMENT CREATED TO CARRY OUT A GOVERNMENTAL FUNCTION OR TO IMPLEMENT A STATUTE OR STATUTES.</p> <p>IF YOU ANSWER YES, YOU MUST COMPLETE <u>SCHEDULE 28</u> CONCERNING NON-GAMING LICENSES AND PERMITS.</p>		<p><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p>

<p>9. HAS APPLICANT, OR ANY OF ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES OR HOLDING COMPANIES APPLIED FOR ANY LICENSE OR PERMIT BY A GOVERNMENT AGENCY CHARGED WITH REGULATING GAMES OF CHANCE, INCLUDING BUT NOT LIMITED TO SLOT MACHINES, VIDEO LOTTERY, TERMINALS, TABLE GAMES, HORSE RACING, JAI ALAI, ETC.? A GOVERNMENT AGENCY AS USED HERE INCLUDES ANY FEDERAL, STATE, NATIVE AMERICAN OR LOCAL GOVERNMENT CREATED TO CARRY OUT A GOVERNMENTAL FUNCTION OR TO IMPLEMENT A STATUTE OR STATUTES.</p> <p>IF YOU ANSWER YES, YOU MUST COMPLETE <u>SCHEDULE 29</u> CONCERNING GAMING LICENSES AND PERMITS.</p>	<p><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p>
<p align="center">APPLICANT'S CONTRIBUTIONS AND DISBURSEMENTS</p>	
<p>10. DURING THE LAST TEN (10) YEAR PERIOD, HAS APPLICANT, ITS PARENT COMPANY, OR ANY OF ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES, HOLDING COMPANIES, PRINCIPALS, EMPLOYEES OR ANY THIRD PARTIES ACTING FOR OR ON BEHALF OF APPLICANT MADE ANY BRIBES OR KICKBACKS OR MADE ANY PAYMENTS ALLEGED TO HAVE BEEN BRIBES OR KICKBACKS TO ANY EMPLOYEE, PERSON, COMPANY OR ORGANIZATION TO OBTAIN FAVORABLE TREATMENT?</p>	<p>Redacted</p>
<p>11. DURING THE LAST TEN (10) YEAR PERIOD, HAS APPLICANT, ITS PARENT COMPANY, OR ANY OF ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES, HOLDING COMPANIES, PRINCIPALS, EMPLOYEES OR ANY THIRD PARTIES ACTING FOR OR ON BEHALF OF THE APPLICANT MADE ANY BRIBES OR KICKBACKS OR MADE ANY PAYMENTS ALLEGED TO HAVE BEEN BRIBES OR KICKBACKS TO ANY GOVERNMENT OFFICIAL, DOMESTIC OR FOREIGN TO OBTAIN FAVORABLE TREATMENT?</p>	<p>Redacted</p>
<p>12. DURING THE LAST TEN (10) YEAR PERIOD, HAS APPLICANT, ITS PARENT COMPANY OR ANY OF ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES, HOLDING COMPANIES, PRINCIPALS, EMPLOYEES OR ANY THIRD PARTIES FOR OR ON BEHALF OF APPLICANT LOANED FUNDS FOR THE PURPOSE OF OPPOSING OR SUPPORTING ANY GOVERNMENT, POLITICAL PARTY, CANDIDATE OR COMMITTEE, EITHER DOMESTIC OR FOREIGN?</p>	<p>Redacted</p>
<p>13. DURING THE LAST TEN (10) YEAR PERIOD, HAS APPLICANT, ITS PARENT COMPANY, OR ANY OF ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES, HOLDING COMPANIES, PRINCIPALS, EMPLOYEES OR ANY THIRD PARTIES ACTING FOR OR ON BEHALF OF APPLICANT DONATED OR LOANED PROPERTY OR ANY OTHER THING OF VALUE, OR ORGANIZED, SPONSORED OR PARTICIPATED IN FUNDRAISING ACTIVITIES FOR THE PURPOSE OF OPPOSING OR SUPPORTING ANY GOVERNMENT, POLITICAL PARTY, CANDIDATE OR COMMITTEE, EITHER DOMESTIC OR FOREIGN?</p>	<p>Redacted</p>
<p>14A. DURING THE LAST TEN (10) YEAR PERIOD, HAS APPLICANT, ITS PARENT COMPANY, OR ANY OF ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES OR HOLDING COMPANIES MADE ANY LOANS, DONATIONS OR OTHER DISBURSEMENTS TO PRINCIPALS, EMPLOYEES OR ANY THIRD PARTIES FOR THE PURPOSE OF REIMBURSING SUCH INDIVIDUALS FOR POLITICAL CONTRIBUTIONS EITHER FOREIGN OR DOMESTIC?</p>	<p>Redacted</p>
<p>14B. DURING THE LAST TEN (10) YEAR PERIOD, HAS APPLICANT, ITS PARENT COMPANY, OR ANY OF ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES OR HOLDING COMPANIES FORMED OR CAUSED TO BE FORMED, A POLITICAL ACTION COMMITTEE EITHER UNDER FEDERAL OR STATE ELECTION LAWS?</p>	<p>Redacted</p>
<p>14C. AS A RESULT OF THE CITIZEN'S UNITED V. FEC DECISION, HAS APPLICANT, ITS PARENT COMPANY, OR ANY OF ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES OR HOLDING COMPANIES MADE "INDEPENDENT EXPENDITURES", AS DEFINED IN SEC. 1621(E) OF THE PENNSYLVANIA ELECTION CODE, FOR THE PURPOSE OF INFLUENCING AN ELECTION COVERED BY THE PENNSYLVANIA ELECTION CODE?</p>	<p>Redacted</p>

15. DURING THE LAST TEN (10) YEAR PERIOD, HAS APPLICANT, ITS PARENT COMPANY, OR ANY OF ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES OR HOLDING COMPANIES MAINTAINED ANY BANK ACCOUNT, DOMESTIC OR FOREIGN, NOT REFLECTED ON THE APPLICANT'S BOOKS OR RECORDS?	Redacted
16. DURING THE LAST TEN (10) YEAR PERIOD, HAS APPLICANT, ITS PARENT COMPANY, OR ANY OF ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES OR HOLDING COMPANIES MAINTAINED ANY NUMBERED ACCOUNT OR ANY ACCOUNT IN THE NAME OF A NOMINEE FOR APPLICANT?	
IF YOU ANSWER YES TO ANY OF THESE QUESTIONS, YOU MUST COMPLETE <u>SCHEDULE 30</u> , CONCERNING CONTRIBUTIONS AND DISBURSEMENTS.	

APPLICATION CHECKLIST

PLACE A CHECKMARK IN THE BOX NEXT TO EACH ITEM APPLICANT HAS ATTACHED TO THIS APPLICATION AND DISCLOSURE INFORMATION FORM.		
EACH ITEM MARKED AS MANDATORY MUST BE COMPLETED AND SUBMITTED AS PART OF THIS APPLICATION FORM. IF ANY ITEM IS MISSING, THE APPLICATION WILL BE CONSIDERED INCOMPLETE AND WILL NOT BE PROCESSED. IF A QUESTION, SCHEDULE OR ADDENDUM DOES NOT APPLY TO THE APPLICANT, YOU MUST WRITE "DOES NOT APPLY" IN EACH FIELD OF THE QUESTION, SCHEDULE OR ADDENDUM.		
<input checked="" type="checkbox"/>	SCHEDULE 1: INCORPORATORS/FOUNDERS	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 2: OTHER NAMES USED BY APPLICANT	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 3: ADDRESSES CURRENTLY USED BY APPLICANT	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 4: ADDRESSES USED BY APPLICANT	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 5: CURRENT OFFICERS, DIRECTORS/PARTNERS AND TRUSTEES	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 6: FORMER (NO LONGER ACTIVE) OFFICERS, DIRECTORS/PARTNERS AND TRUSTEES	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 7: EMPLOYEES EARNING OVER \$250,000 IN ANNUAL COMPENSATION FROM APPLICANT	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 8: BONUS, PROFIT SHARING, PENSION RETIREMENT, DEFERRED COMPENSATION & SIMILAR PLANS	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 9: STOCK DESCRIPTION (FOR C CORPORATIONS, S-CORPORATIONS, LLCs)	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 10: VOTING SHAREHOLDERS (FOR C CORPORATIONS, S-CORPORATIONS, LLCs)	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 10A: INTEREST OF CURRENT PARTNERS (FOR PARTNERSHIPS, LLPs, LIMITED PARTNERSHIPS, LLCs)	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 10B: INTEREST OF FORMER PARTNERS (FOR PARTNERSHIPS, LLPs, LIMITED PARTNERSHIPS, LLCs)	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 11: NON-VOTING SHAREHOLDERS (FOR C CORPORATIONS, S-CORPORATIONS, LLCs)	MANDATORY

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<input checked="" type="checkbox"/>	SCHEDULE 12: LONG TERM DEBT	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 13: HOLDERS OF LONG TERM DEBT	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 14: OTHER INDEBTEDNESS AND SECURITY DEVICES	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 15: HOLDER OF OTHER INDEBTEDNESS	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 16: SECURITIES OPTIONS	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 17: BENEFICIAL OWNER OF OPTIONS	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 18: OTHER PRINCIPALS	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 19: FINANCIAL INSTITUTIONS	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 20: CONTRACTS	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 21: STOCK HELD BY APPLICANT	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 22: INSIDER TRANSACTIONS	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 23: CRIMINAL HISTORY	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 24: TESTIMONY, INVESTIGATIONS OR POLYGRAPHS	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 25: EXISTING LITIGATION	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 26: ANTITRUST, TRADE REGULATION AND SECURITY JUDGMENTS; STATUTORY AND REGULATORY VIOLATIONS	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 27: BANKRUPTCY OR INSOLVENCY PROCEEDINGS	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 28: NON-GAMING LICENSES AND PERMITS	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 29: GAMING LICENSES AND PERMITS	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 30: APPLICANT'S CONTRIBUTIONS AND DISBURSEMENTS	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 31: APPLICANT BACKGROUND PART 1	MANDATORY
<input checked="" type="checkbox"/>	SCHEDULE 32: APPLICANT BACKGROUND PART 2	MANDATORY
<input checked="" type="checkbox"/>	APPLICATION FOR PENNSYLVANIA TAX CLEARANCE REVIEW	MANDATORY
<input checked="" type="checkbox"/>	AFFIDAVIT	MANDATORY
<input checked="" type="checkbox"/>	RELEASE AUTHORIZATION	MANDATORY
<input checked="" type="checkbox"/>	WAIVER OF LIABILITY	MANDATORY
<input checked="" type="checkbox"/>	DIVERSITY PLAN STATEMENT	MANDATORY
<input checked="" type="checkbox"/>	CONDITIONAL/CATEGORY 1 APPLICANT'S AFFIRMATION	CATEGORY 1 APPLICANT ONLY

<input checked="" type="checkbox"/>	ADDENDUM 1 - REQUEST FOR USE OF ALTERNATIVE CATEGORY 1 SLOT MACHINE LICENSING STANDARDS FORM	CATEGORY 1 APPLICANT ONLY
<input checked="" type="checkbox"/>	ALTERNATIVE LICENSING AFFIDAVIT	OPTIONAL CATEGORY 1 APPLICANT ONLY
<input checked="" type="checkbox"/>	LICENSED ENTITY REPRESENTATIVE REGISTRATION	MANDATORY
<input checked="" type="checkbox"/>	ANNUAL CERTIFICATION TO PREVENT VIOLATIONS OF SECTION 1513 FORM	MANDATORY
<input checked="" type="checkbox"/>	PENNSYLVANIA POLITICAL CONTRIBUTIONS FORM	MANDATORY
<input checked="" type="checkbox"/>	FINANCIAL STATEMENT CERTIFICATION	MANDATORY
<input checked="" type="checkbox"/>	MULTI-JURISDICTIONAL PERSONAL HISTORY DISCLOSURE FORM (ONE FOR EACH NATURAL PERSON WHO IS A PRINCIPAL OR KEY EMPLOYEE)	MANDATORY
<input checked="" type="checkbox"/>	PRINCIPAL/KEY EMPLOYEE FORM - PENNSYLVANIA SUPPLEMENT TO THE MULTI-JURISDICTIONAL PERSONAL HISTORY DISCLOSURE FORM (ONE FOR EACH NATURAL PERSON WHO IS A PRINCIPAL OR KEY EMPLOYEE)	MANDATORY
<input checked="" type="checkbox"/>	PRINCIPAL ENTITY FORM (ONE FOR EACH ENTITY THAT IS A PRINCIPAL)	MANDATORY

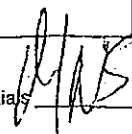
APPENDICES

APPENDICES: THE APPENDICES ARE DOCUMENTS THE APPLICANT MUST PROVIDE OR CREATE. THE APPENDICES ARE NOT REPRESENTED IN THE APPLICATION QUESTIONS OR ITS SCHEDULES OR ADDENDA. EACH APPENDIX SHALL BE PRESENTED IN A TABBED MANNER AND EACH TAB MUST INDICATE THE APPENDIX NUMBER AS LISTED BELOW. IF AN APPENDIX DOES NOT APPLY TO AN APPLICANT, WRITE "DOES NOT APPLY" ON THE APPENDIX PAGE.

<input checked="" type="checkbox"/>	APPENDIX 1: DESCRIPTION OF THE BUSINESS CURRENTLY PERFORMED AND THE BUSINESS INTENDED TO BE PERFORMED IN THE COMMONWEALTH. THIS INFORMATION MUST BE SPECIFIC AND MUST BE ORGANIZED AROUND THE TOPICS SHOWN IN <u>SCHEDULES 31 AND 32</u> . ADDITIONALLY, APPLICANT MUST INDICATE THE RELATIONSHIP BETWEEN IT AND ITS AFFILIATED ENTITIES AS IT RELATES TO THE BUSINESS INTENDED TO BE PERFORMED IN THE COMMONWEALTH IN THE FORM OF AN ORGANIZATION CHART WITH A NARRATIVE DESCRIPTION.	MANDATORY
<input type="checkbox"/>	APPENDIX 2: DESCRIPTION OF ANY FORMER BUSINESS ENGAGED IN DURING THE LAST TEN (10) YEARS AND THE REASON FOR CESSATION OF THE BUSINESS.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 3: DESCRIPTION OF ALL BONUS, PROFIT SHARING, PENSION, RETIREMENT, DEFERRED COMPENSATION AND SIMILAR PLANS. THIS INFORMATION MUST BE PROVIDED IN ADDITION TO THE INFORMATION PROVIDED IN <u>SCHEDULE 8</u> .	MANDATORY
<input type="checkbox"/>	APPENDIX 4: DESCRIPTION OF LONG TERM DEBT. THIS INFORMATION MUST BE PROVIDED IN ADDITION TO THE INFORMATION PROVIDED IN <u>SCHEDULES 12 AND 13</u> .	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 5: DESCRIPTION OF OTHER INDEBTEDNESS AND SECURITY DEVICES. THIS INFORMATION MUST BE PROVIDED IN ADDITION TO THE INFORMATION PROVIDED IN <u>SCHEDULES 14 AND 15</u> .	MANDATORY
<input type="checkbox"/>	APPENDIX 6: DESCRIPTION OF SECURITIES OPTIONS. THIS INFORMATION MUST BE PROVIDED IN ADDITION TO THE INFORMATION PROVIDED IN <u>SCHEDULES 16 AND 17</u> .	MANDATORY
<input type="checkbox"/>	APPENDIX 7: DESCRIPTION OF EXISTING LITIGATION. THIS INFORMATION MUST BE PROVIDED IN ADDITION TO THE INFORMATION PROVIDED IN <u>SCHEDULE 25</u> .	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 8: AUDITED FINANCIAL STATEMENT FOR THE LAST FISCAL YEAR. IF THE APPLICANT DOES NOT NORMALLY HAVE ITS FINANCIAL STATEMENTS AUDITED, ATTACH UNAUDITED FINANCIAL STATEMENTS.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 9: AUDITED FINANCIAL STATEMENTS FOR THE LAST FIVE (5) YEARS. IF THE APPLICANT DOES NOT NORMALLY HAVE ITS FINANCIAL STATEMENTS AUDITED, ATTACH UNAUDITED FINANCIAL STATEMENTS.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 10: ANNUAL REPORTS FOR THE LAST FIVE (5) YEARS.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 11A: ANNUAL REPORTS PREPARED ON THE SEC'S 10K FOR THE LAST FIVE (5) YEARS. APPENDIX 11B: COPIES OF ANNUAL OR QUARTERLY FILINGS FOR THE LAST FIVE (5) YEARS REQUIRED UNDER THE LAWS OF A REGULATORY AGENCY OF ANOTHER COUNTRY.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 12: A COPY OF THE LAST QUARTERLY UNAUDITED FINANCIAL STATEMENT.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 13: A COPY OR COPIES OF ANY INTERIM REPORTS.	MANDATORY

[Handwritten Signature]

<input checked="" type="checkbox"/>	APPENDIX 14: A COPY OF THE LAST DEFINITIVE PROXY OR INFORMATION STATEMENT (SEC).	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 15: A COPY OF ALL REGISTRATION STATEMENTS FOR THE LAST FIVE (5) YEARS FILED IN ACCORDANCE WITH THE SECURITIES ACT OF 1933.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 16: COPIES OF ALL OTHER REPORTS PREPARED IN THE LAST FIVE (5) YEARS BY INDEPENDENT AUDITORS OF THE APPLICANT.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 17: CERTIFIED COPIES OF THE ARTICLES OF INCORPORATION, CHARTER, BYLAWS, PARTNERSHIP AGREEMENT OR OTHER OFFICIAL DOCUMENTS AND ALL AMENDMENTS AND PROPOSED AMENDMENTS.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 18: CURRENT OWNERSHIP TABLE OF ORGANIZATION.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 19: FUNCTIONAL TABLE OF ORGANIZATION FOR APPLICANT WITH, JOB DESCRIPTIONS, AND NAMES OF EMPLOYEES EARNING IN EXCESS OF \$250,000 IN ANNUAL COMPENSATION.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 20: COPIES OF FEDERAL ENTITY TAX FILINGS, INCLUDING FORMS 1120, 1120-S, 1120-F, 1065, 941 AND ALL OTHER BUSINESS RELATED TAX FORMS FILED WITH THE IRS IN THE LAST FIVE (5) YEARS.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 21: COPIES OF 5500 FORMS FILED WITH THE IRS IN THE LAST FIVE (5) YEARS.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 22: DESCRIBE CRIMINAL HISTORY OF APPLICANT. THIS INFORMATION MUST BE PROVIDED IN ADDITION TO THE INFORMATION PROVIDED IN <u>SCHEDULE 23</u> . NARRATIVE INFORMATION ABOUT THE NATURE OF CHARGE OR COMPLAINT AND THE DISPOSITION MUST BE PROVIDED.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 23: PURSUANT TO §1312 OF THE GAMING ACT, THE BOARD MAY NOT APPROVE AN APPLICATION FOR LICENSURE IF ANY OF ITS PRINCIPALS DO NOT MEET THE CHARACTER REQUIREMENTS OF §1310, ELIGIBILITY REQUIREMENTS, OR PURCHASES A CONTROLLING INTEREST IN A LICENSED GAMING ENTITY IN VIOLATION OF §1328. HAS THE APPLICANT DIVESTED ALL INTERESTS THAT WOULD PROHIBIT LICENSURE AND ELIMINATED ANY PRINCIPAL WHO DOES NOT MEET THE CHARACTER OR ELIGIBILITY REQUIREMENTS? IF NOT, PROVIDE AN EXPLANATION. IF IT DOES NOT APPLY, WRITE DOES NOT APPLY IN RESPONSE TO THIS APPENDIX.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 24: PURSUANT TO §1330 OF THE GAMING ACT, NO LICENSEE, ITS AFFILIATE, INTERMEDIARY, SUBSIDIARY OR HOLDING COMPANY MAY POSSESS AN OWNERSHIP OR FINANCIAL INTEREST THAT IS GREATER THAN 33.3% OF ANOTHER SLOT MACHINE LICENSEE OR PERSON ELIGIBLE TO APPLY FOR A CATEGORY 1 LICENSE, ITS AFFILIATE, INTERMEDIARY, SUBSIDIARY OR HOLDING COMPANY. DOES THE APPLICANT POSSESS AN OWNERSHIP OR FINANCIAL INTEREST THAT IS GREATER THAN 33.3% OF ANOTHER SLOT MACHINE LICENSEE OR PERSON ELIGIBLE TO APPLY FOR A CATEGORY 1 LICENSE, ITS AFFILIATE, INTERMEDIARY, SUBSIDIARY OR HOLDING COMPANY? PROVIDE AN EXPLANATION OR WRITE "DOES NOT APPLY".	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 25: PURSUANT TO §1512 OF THE GAMING ACT, NO EXECUTIVE-LEVEL STATE EMPLOYEE, PUBLIC OFFICIAL, PARTY OFFICER OR IMMEDIATE FAMILY MEMBER THEREOF SHALL HAVE A FINANCIAL INTEREST IN OR BE EMPLOYED, DIRECTLY OR INDIRECTLY, BY ANY LICENSED RACING ENTITY OR LICENSED GAMING ENTITY, OR ANY HOLDING, AFFILIATE, INTERMEDIARY OR SUBSIDIARY COMPANY, THEREOF, OR ANY SUCH APPLICANT.	MANDATORY



	HAS ANY PUBLIC OFFICIAL OR OTHER PROHIBITED PERSON POSSESSED A FINANCIAL INTEREST IN OR BEEN EMPLOYED DIRECTLY OR INDIRECTLY BY THE APPLICANT OR RELATED ENTITY AT OR FOLLOWING THE EFFECTIVE DATE OF THE PA GAMING ACT?	
<input checked="" type="checkbox"/>	APPENDIX 26: PURSUANT TO §1313 OF THE GAMING ACT, PROVIDE INFORMATION, DOCUMENTATION AND ASSURANCES DEMONSTRATING THAT THE APPLICANT HAS SUFFICIENT BUSINESS ABILITY AND EXPERIENCE TO CREATE AND MAINTAIN A SUCCESSFUL, EFFICIENT OPERATION. ALSO PROVIDE BIOGRAPHIES OF THE KNOWN INDIVIDUALS WHO WILL PERFORM EXECUTIVE MANAGEMENT DUTIES AND PROVIDE NAMES OF ALL PROPOSED KEY EMPLOYEES AND A DESCRIPTION OF THEIR RESPECTIVE OR PROPOSED RESPONSIBILITIES AS THEY BECOME KNOWN.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 27: PURSUANT TO §1207(16) OF THE GAMING ACT, THE LICENSEE MUST SELL PENNSYLVANIA STATE LOTTERY TICKETS AT ITS FACILITY AS NEAR AS PRACTICABLE TO THE PAY WINDOWS. PROVIDE A PROPOSED FLOOR PLAN SPECIFYING THE LOCATIONS WHERE STATE LOTTERY TICKETS WILL BE SOLD AND THE PROXIMITY OF THOSE LOCATIONS TO PAY WINDOWS. (NOTE: THIS SUBMISSION MUST BE FINALIZED AND APPROVED BY THE BOARD PRIOR TO OPERATION).	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 28: PROVIDE A LIST OF ANY HOSPITAL, PLACE OF WORSHIP, SCHOOL, CHARITABLE INSTITUTION, PARK, ZOO OR ANY SIMILAR PLACE FREQUENTED BY THE PUBLIC WITHIN 1500 FEET OF THE PROPOSED FACILITY.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 29: SUBMIT AN INITIAL NARRATIVE DESCRIPTION OF PROPOSED ADMINISTRATIVE AND ACCOUNTING PROCEDURES, INCLUDING A WRITTEN SYSTEM OF INTERNAL CONTROL, PURSUANT TO §1322 OF THE GAMING ACT (NOTE: THIS SUBMISSION MUST BE FINALIZED AND APPROVED BY THE BOARD PRIOR TO OPERATION).	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 30: PROVIDE MARKETING PLANS AND PROPOSALS AND DETAILS OF THE PROXIMITY OF THE FACILITY TO ITS MARKETING SERVICE AREA.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 31: PROVIDE COPIES OF LOCAL ZONING AND LAND USE APPROVALS OR A DETAILED EXPLANATION OF THE STATUS OF THE REQUEST WITH COPIES OF ALL FILINGS.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 32: PURSUANT TO §1322 OF THE GAMING ACT AND/OR BOARD REGULATIONS, SUBMIT A COMPLETE PROPOSED SITE PLAN OF THE PROPOSED LICENSED FACILITY, INCLUSIVE OF TRAFFIC STUDIES AND THE PARKING PLAN, INCLUDING THE NUMBER OF PARKING SPACES, ACCOMPANIED BY ARCHITECTURAL DRAWINGS AND A PROPOSED GAMING FLOOR LAYOUT. THE GAMING FLOOR LAYOUT SHOULD CLEARLY DELINEATE THE SQUARE FOOTAGE OF THE AREA TO BE USED FOR THE PLACEMENT OF SLOT MACHINES AND TABLE GAMES AS WELL AS THE SQUARE FOOTAGE OF THE AREA THAT WILL NOT BE USED FOR THE PLACEMENT OF SLOT MACHINES AND TABLE GAMES. FURTHER, THE GAMING FLOOR LAYOUT SHOULD DELINEATE THE SQUARE FOOTAGE RESERVED FOR ADDITIONAL SLOT MACHINES AND TABLE GAMES PERMITTED PURSUANT TO §1210 AND §13A11 OF THE GAMING ACT. PURSUANT TO §1210, PROVIDE DETAILS OF THE PROPOSED LOCATION OF SLOT MACHINES AND TABLE GAMES AT THE FACILITY AND THE NUMBER OF SLOT MACHINES AND TABLE GAMES REQUESTED. PURSUANT TO §1207 OF THE GAMING ACT, PROPOSED SURVEILLANCE CAMERA LOCATIONS BOTH WITHIN AND OUTSIDE THE PROPOSED LICENSED FACILITY SHOULD ALSO BE CLEARLY DELINEATED ON THE GAMING FLOOR LAYOUT AS WELL AS PROPOSED SECURITY ZONES ON THE GAMING FLOOR AND WITHIN AND OUTSIDE THE LICENSED FACILITY. (NOTE: THE SITE PLAN, GAMING FLOOR LAYOUT AND RELATED SURVEILLANCE AND SECURITY PROPOSALS MUST BE FINALIZED AND APPROVED BY THE BOARD PRIOR TO OPERATION).	MANDATORY

<input checked="" type="checkbox"/>	APPENDIX 33: PROVIDE DETAILS OF PLANNED RETAIL AND FOOD VENUES FOR THE FACILITY AND THE IDENTIFICATION OF THE OPERATORS OF EACH RETAIL FOOD VENUE.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 34: PROVIDE A LOCAL IMPACT REPORT, ENGINEERING REPORTS AND TRAFFIC STUDIES, INCLUDING DETAILS OF ANY ADVERSE IMPACT ON TRANSPORTATION, TRANSIT ACCESS, HOUSING, WATER AND SEWER SYSTEMS, LOCAL POLICE AND EMERGENCY SERVICE CAPABILITIES, EXISTING TOURISM, INCLUDING HISTORICAL AND CULTURAL RESOURCES OR OTHER MUNICIPAL SERVICE OR RESOURCE. A COPY OF THE LOCAL IMPACT REPORT SHALL BE PROVIDED TO EACH POLITICAL SUBDIVISION IN WHICH THE LICENSED FACILITY WILL BE LOCATED AT LEAST SEVEN (7) DAYS PRIOR TO THE FILING OF THE APPLICATION FOR A SLOT MACHINE LICENSE. THE APPLICANT SHALL FILE A PROOF OF SERVICE WITH THE BOARD.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 35: PROVIDE DETAILS OF LAND ACQUISITION COSTS.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 36: PROVIDE DETAILS OF A COMPULSIVE OR PROBLEM GAMBLING PLAN.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 37: IF A TEMPORARY FACILITY IS TO BE LICENSED, PROVIDE DETAILS OF THE TEMPORARY FACILITY AS WELL AS A PLAN FOR HOW THE LICENSEE WILL TRANSITION TO A PERMANENT FACILITY, INCLUDING A DATE FOR THE COMPLETION OF THE PERMANENT FACILITY.	MANDATORY
<input checked="" type="checkbox"/>	<p>APPENDIX 38: AS REQUIRED BY §1325 OF THE GAMING ACT, APPLICANT MUST ADDRESS EACH ITEM LISTED IN THIS SECTION. IF AN ITEM DOES NOT APPLY, THE APPLICANT MUST STATE THAT IN RESPONSE TO EACH ITEM LISTED. PROVIDE A PLAN, WITH DETAILS, FOR THE FOLLOWING:</p> <p>(1) THE LOCATION AND QUALITY OF THE PROPOSED FACILITY, INCLUDING, BUT NOT LIMITED TO, ROAD AND TRANSIT ACCESS, PARKING AND CENTRALITY TO MARKET SERVICE AREA;</p> <p>(2) THE POTENTIAL FOR NEW JOB CREATION AND ECONOMIC DEVELOPMENT WHICH WILL RESULT FROM GRANTING A LICENSE TO THE APPLICANT;</p> <p>(3) THE APPLICANT'S GOOD FAITH PLAN TO RECRUIT, TRAIN AND UPGRADE DIVERSITY IN ALL EMPLOYMENT CLASSIFICATIONS IN THE FACILITY;</p> <p>(4) THE APPLICANT'S GOOD FAITH PLAN FOR ENHANCING THE REPRESENTATION OF DIVERSE GROUPS IN THE OPERATION OF ITS FACILITY THROUGH THE OWNERSHIP AND OPERATION OF BUSINESS ENTERPRISES ASSOCIATED WITH OR UTILIZED BY ITS FACILITY OR THROUGH THE PROVISION OF GOODS OR SERVICES UTILIZED BY ITS FACILITY AND THROUGH THE PARTICIPATION IN THE OWNERSHIP OF THE APPLICANT. PROVIDE SPECIFIC INFORMATION REGARDING THE DIVERSITY IN OWNERSHIP OF THE APPLICANT, I.E. MINORITIES, WOMEN;</p> <p>(5) THE APPLICANT'S GOOD FAITH EFFORT TO ASSURE THAT ALL PERSONS ARE ACCORDED EQUALITY OF OPPORTUNITY IN EMPLOYMENT AND CONTRACTING BY IT AND ANY CONTRACTORS, SUBCONTRACTORS, ASSIGNEES, LESSEES, AGENTS, GAMING SERVICE PROVIDERS AND SUPPLIERS IT MAY EMPLOY DIRECTLY OR INDIRECTLY;</p> <p>(6) THE HISTORY AND SUCCESS OF THE APPLICANT IN DEVELOPING TOURISM FACILITIES ANCILLARY TO GAMING DEVELOPMENT, IF APPLICABLE TO THE APPLICANT;</p> <p>(7) THE DEGREE TO WHICH THE APPLICANT PRESENTS A PLAN FOR THE PROJECT WHICH WILL LIKELY LEAD TO THE CREATION OF QUALITY, LIVING-WAGE JOBS AND FULL-TIME PERMANENT JOBS FOR RESIDENTS OF THIS COMMONWEALTH GENERALLY AND FOR RESIDENTS OF THE HOST POLITICAL SUBDIVISION IN PARTICULAR;</p>	MANDATORY

	<p>(8) THE RECORD OF THE APPLICANT AND ITS DEVELOPER IN MEETING COMMITMENTS TO LOCAL AGENCIES, COMMUNITY-BASED ORGANIZATIONS AND EMPLOYEES' IN OTHER LOCATIONS;</p> <p>(9) THE DEGREE TO WHICH POTENTIAL ADVERSE EFFECTS WHICH MIGHT RESULT FROM THE PROJECT, INCLUDING COSTS OF MEETING THE INCREASED DEMAND FOR PUBLIC HEALTH CARE, CHILD CARE, PUBLIC TRANSPORTATION, AFFORDABLE HOUSING AND SOCIAL SERVICES, WILL BE MITIGATED;</p> <p>(10) THE RECORD OF THE APPLICANT AND ITS DEVELOPER REGARDING COMPLIANCE WITH</p> <p>(i) FEDERAL, STATE AND LOCAL DISCRIMINATION, WAGE AND HOUR, DISABILITY AND OCCUPATIONAL AND ENVIRONMENTAL HEALTH AND SAFETY LAWS AS WELL AS</p> <p>(ii) STATE AND LOCAL LABOR RELATIONS AND EMPLOYMENT LAWS;</p> <p>(iii) THE APPLICANT'S RECORD IN DEALING WITH ITS EMPLOYEES AND THEIR REPRESENTATIVES AT OTHER LOCATIONS.</p>	
<input checked="" type="checkbox"/>	APPENDIX 39: PROVIDE INFORMATION DEMONSTRATING ADEQUATE FINANCING FOR THE PROPOSED FACILITY AND TERMS OF FINANCING INCLUDING PAYBACK PERIOD.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 40: PROVIDE BUSINESS AND ECONOMIC DEVELOPMENT PLANS AND TIMETABLES, PROJECTED DEBT SERVICE EXPENSES, PROJECTED EBITDA AND INTERNAL RATE OF RETURN, PROJECTED ANNUAL GROSS TERMINAL REVENUE, PROJECTED OPERATING AND CAPITAL EXPENSES AND DEFINED GAMING MARKET AND PROJECTED VISITATION.	MANDATORY
<input checked="" type="checkbox"/>	<p>APPENDIX 41: PROVIDE LETTERS OF REFERENCE FROM LAW ENFORCEMENT AGENCIES HAVING JURISDICTION IN THE APPLICANT'S AND PRINCIPAL'S MAIN PLACE OF RESIDENCE AND PLACE OF BUSINESS INDICATING THAT THE AGENCY DOES NOT HAVE ANY PERTINENT INFORMATION RELATING TO THE APPLICANT OR ITS PRINCIPALS. IF THE LAW ENFORCEMENT AGENCY HAS INFORMATION PERTAINING TO THE APPLICANT OR ITS PRINCIPALS, THE LETTER SHALL SPECIFY THE DETAILS OF THE INFORMATION.</p> <p>IF NO LETTERS ARE RECEIVED WITHIN 30 DAYS OF THE REQUEST, THE APPLICANT OR PRINCIPAL MAY SUBMIT A SWORN OR AFFIRMED STATEMENT THAT THE APPLICANT OR PRINCIPAL IS A CITIZEN IN GOOD STANDING IN HIS JURISDICTION OF RESIDENCE AND PRIMARY PLACE OF BUSINESS.</p>	MANDATORY
<input checked="" type="checkbox"/>	<p>APPENDIX 42: IF THE APPLICANT HAS HELD A GAMING LICENSE IN ANY JURISDICTION, PROVIDE A LETTER OF REFERENCE FROM THE GAMING OR CASINO ENFORCEMENT OR REGULATORY AGENCY IN THE OTHER JURISDICTION, SPECIFYING THE EXPERIENCES OF THE AGENCY WITH THE APPLICANT, THE APPLICANT'S ASSOCIATES AND THE APPLICANT'S GAMING OPERATION.</p> <p>IF NO LETTER IS RECEIVED WITHIN 30 DAYS OF REQUEST BY THE APPLICANT, THE APPLICANT MAY SUBMIT A SWORN OR AFFIRMED STATEMENT THAT THE APPLICANT'S OPERATION IS IN GOOD STANDING WITH THE REGULATORY AGENCY.</p>	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 43: PROVIDE AN ORIGINAL PAYMENT BOND OR AN ORIGINAL IRREVOCABLE LETTER OF CREDIT THAT INCLUDES A DRAW CERTIFICATE, AT THE APPLICANT'S OPTION, GUARANTEEING THE APPLICANT'S PAYMENT OF THE SLOT MACHINE LICENSE FEE REQUIRED BY §1209 (FOR CATEGORY 1 AND 2) AND §1305 (CATEGORY 3) OF THE GAMING ACT.	MANDATORY
<input checked="" type="checkbox"/>	APPENDIX 44: PROVIDE A CHART OF EXISTING GAMING SERVICE PROVIDERS* INCLUDING THE NAME, ADDRESS, PHONE AND TAX IDENTIFICATION NUMBER OF THE	MANDATORY

	<p>GAMING SERVICE PROVIDERS, TYPES OF GOODS AND/OR SERVICES PROVIDED BY THE GAMING SERVICE PROVIDERS, TOTAL DOLLAR AMOUNT OF BUSINESS WITH GAMING SERVICE PROVIDERS IN THE PAST TWELVE (12) MONTHS AND TOTAL DOLLAR AMOUNT OF BUSINESS EXPECTED TO BE CONDUCTED WITH GAMING SERVICE PROVIDERS IN THE NEXT TWELVE (12) MONTHS.</p> <p>* GAMING SERVICE PROVIDERS IS DEFINED IN 58 PA. CODE §401A.3.</p>	
<input checked="" type="checkbox"/>	<p>APPENDIX 45: PROVIDE A SUMMARY OF ALL PERSONS WHO HOLD AN OWNERSHIP OR OTHER BENEFICIAL INTEREST IN THE APPLICANT AND ANY SUCH INTEREST IN ANY OF ITS PRINCIPAL AFFILIATES OR PRINCIPAL ENTITIES REQUIRED TO BE LICENSED OR PERMITTED IN PENNSYLVANIA; PROVIDED HOWEVER, IF ANY OF THE ENTITIES ARE PUBLICLY TRADED, ONLY INTERESTS EQUAL TO OR EXCEEDING FIVE PERCENT MUST BE DISCLOSED. OWNERSHIP INTEREST SHOULD BE PROVIDED IN A MANNER CONSISTENT WITH THE OWNERSHIP INTEREST REPORT FOUND ON THE BOARD'S WEBSITE UNDER LICENSURE/REPORTS AND GENERAL INFORMATION.</p>	MANDATORY

CATEGORY 1 APPLICANTS ONLY

<input checked="" type="checkbox"/>	<p>APPENDIX 46: PURSUANT TO §1308(C) OF THE GAMING ACT, THE BOARD AND THE COMMISSIONS SHALL NOT CONSIDER ANY APPLICATION FOR A LICENSE IF THE APPLICANT OR ANY PERSON AFFILIATED WITH OR DIRECTLY RELATED TO THE APPLICANT IS A PARTY IN ANY ONGOING CIVIL PROCEEDING IN WHICH THE PARTY IS SEEKING TO OVERTURN OR OTHERWISE CHALLENGE A DECISION OR ORDER OF THE BOARD OR COMMISSIONS PERTAINING TO THE APPROVAL, DENIAL OR CONDITIONING OF A LICENSE TO CONDUCT THOROUGHBRED OR HARNESS HORSE RACE MEETINGS RESPECTIVELY WITH PARI-MUTUEL WAGERING OR TO OPERATE SLOT MACHINES.</p> <p>IS THE APPLICANT OR AFFILIATED PERSON A PARTY TO ANY ONGOING CIVIL PROCEEDINGS SEEKING TO OVERTURN A DECISION OR ORDER OF THE BOARD OR COMMISSIONS? IF YES, THE BOARD MAY NOT CONSIDER THE APPLICATION. IF NO, PROVIDE A STATEMENT ASSERTING THAT THE APPLICANT IS NOT CHALLENGING THE BOARD OR COMMISSION'S DECISION OR ORDERS.</p>	CATEGORY 1 APPLICANT ONLY
<input checked="" type="checkbox"/>	<p>APPENDIX 47: PROVIDE A VERIFICATION FROM THE HORSE RACING COMMISSION OR THE HARNESS RACING COMMISSION STATING THAT THE APPLICANT HAS SATISFIED THE LICENSE ELIGIBILITY REQUIREMENTS UNDER §1302 OF THE GAMING ACT (RELATING TO CONDITIONAL/CATEGORY 1 SLOT MACHINE LICENSE) AND THAT THE APPLICANT SATISFIES THE LIVE RACING REQUIREMENTS UNDER §1303 OF THE GAMING ACT.</p>	CATEGORY 1 APPLICANT ONLY
<input checked="" type="checkbox"/>	<p>APPENDIX 48: PROVIDE A STATEMENT DETAILING THE APPLICANT'S REGULATORY HISTORY AS A LICENSED RACING ENTITY UNDER THE JURISDICTION OF THE PENNSYLVANIA HORSE RACING COMMISSION OR STATE HARNESS RACING COMMISSION, INCLUDING THE APPLICANT'S HISTORY OF SUITABILITY AND COMPLIANCE WITH THE RACE HORSE INDUSTRY REFORM ACT IN THE OPERATION OF THE RACE TRACK AND NONPRIMARY LOCATIONS AND THE CONDUCT OF PARI-MUTUEL WAGERING.</p>	CATEGORY 1 APPLICANT ONLY
<input checked="" type="checkbox"/>	<p>APPENDIX 49: PROVIDE A DETAILED PLAN FOR THE MANAGEMENT OF ACCOUNTS CREATED FROM FUNDS ALLOCATED UNDER §1406 OF THE GAMING ACT (RELATING TO DISTRIBUTIONS FROM PENNSYLVANIA RACE HORSE DEVELOPMENT FUND).</p>	CATEGORY 1 APPLICANT ONLY
<input checked="" type="checkbox"/>	<p>APPENDIX 50: PROVIDE A DETAILED PLAN FOR THE MANAGEMENT AND USE OF BACKSIDE AREA IMPROVEMENT AND MAINTENANCE ACCOUNTS UNDER §1404 OF THE GAMING ACT (RELATING TO DISTRIBUTION FROM LICENSEE'S REVENUE RECEIPTS).</p>	CATEGORY 1 APPLICANT ONLY

[Handwritten Signature]

CATEGORY 3 APPLICANTS ONLY

<input type="checkbox"/>	APPENDIX 51: PROVIDE A STATEMENT DETAILING THE PROPOSED PLANS AND LOCATION OF THE LICENSED FACILITY AND EXPLAIN HOW THE FACILITY WILL BE LOCATED AT A WELL-ESTABLISHED RESORT HOTEL (AS DEFINED IN BOARD REGULATIONS). INCLUDE A STATEMENT OF THE NUMBER OF ROOMS UNDER COMMON OWNERSHIP, AND HOW EACH ROOM IS HELD, I.E. NON-DEEDED TIME SHARE, DEEDED TIME SHARE AND STANDARD HOTEL ROOM. ALSO INCLUDE IN THE STATEMENT A LIST OF THE SUBSTANTIAL YEAR-ROUND RECREATIONAL GUEST AMENITIES OFFERED. THE STATEMENT MUST ALSO DEMONSTRATE COMPLIANCE WITH THE GEOGRAPHICAL REQUIREMENTS OF §1305(B) OF THE GAMING ACT (RELATING TO CATEGORY 3 SLOT MACHINE LICENSE), WHICH PROVIDES THAT NO CATEGORY 3 LICENSEE SHALL BE LOCATED WITHIN 15 LINEAR MILES OF ANOTHER LICENSED FACILITY.	CATEGORY 3 APPLICANT ONLY
<input type="checkbox"/>	APPENDIX 52: PROVIDE DOCUMENTATION TO THE BOARD PROVING THAT THE APPLICANT IS THE OWNER OF THE WELL-ESTABLISHED RESORT HOTEL OR IS A WHOLLY OWNED SUBSIDIARY OF THE OWNER OF THE WELL-ESTABLISHED RESORT HOTEL.	CATEGORY 3 APPLICANT ONLY
<input type="checkbox"/>	APPENDIX 53: PROVIDE A STATEMENT DETAILING THE APPLICANT'S PROPOSED AMENITIES PLAN. EXPLAIN THE AMENITIES THAT THE APPLICANT INTENDS TO MAKE AVAILABLE AT THE RESORT HOTEL AND THE COSTS OF THE AMENITIES TO PATRONS OF THE RESORT HOTEL.	CATEGORY 3 APPLICANT ONLY
<input type="checkbox"/>	APPENDIX 54: PROVIDE A PROPOSED FEE SCHEDULE FOR EACH AMENITY OFFERED AT THE WELL-ESTABLISHED RESORT AND A JUSTIFICATION FOR HOW THE FEES MEET THE DEFINITION OF NON-DE MINIMIS CONSIDERATION (AS DEFINED IN BOARD REGULATIONS). THE FEE SCHEDULE SHOULD INCLUDE PROPOSED FEES FOR SEASONAL OR YEAR-ROUND MEMBERSHIPS.	CATEGORY 3 APPLICANT ONLY
<input type="checkbox"/>	APPENDIX 55: PROVIDE A PLAN DETAILING HOW THE APPLICANT, AS PART OF ITS OPERATIONAL PLAN, WILL MONITOR THE GAMING AREA TO ENSURE COMPLIANCE WITH REGULATIONS RELATING TO SELF-EXCLUSION; PERSONS REQUIRED TO BE EXCLUDED AND UNDERAGE GAMING AND THAT ONLY THE FOLLOWING PERSONS ARE PERMITTED TO ENTER THE GAMING AREA: (1) REGISTERED OVERNIGHT GUESTS; (2) PATRONS OF ONE OR MORE AMENITIES (AS PATRON OF THE AMENITIES IS DEFINED IN BOARD REGULATIONS); (3) AUTHORIZED EMPLOYEES; (4) ANY OTHER PERSONS AUTHORIZED BY THE BOARD. THE PLAN SHOULD INCLUDE METHODS FOR CONTROLLING ACCESS TO THE GAMING FLOOR BY THOSE INDIVIDUALS HOLDING VALID SEASONAL OR YEAR-ROUND MEMBERSHIPS AND PATRONS OF THE AMENITIES SEEKING TO ACCESS THE GAMING FLOOR WITHIN 72 HOURS OF THE USE OF THE AMENITY.	CATEGORY 3 APPLICANT ONLY

[Handwritten Signature]

SCHEDULE 1: INCORPORATORS/FOUNDERS

FIRST NAME Manuel		MIDDLE NAME Nicholas		LAST NAME Slamatakis		SUFFIX (JR., SR., ETC.)	
OCCUPATION Businessman		TITLE					
ADDRESS LINE 1		ADDRESS LINE 2					
COUNTRY		CITY		STATE/PROVINCE		POSTAL CODE	
EMAIL ADDRESS		PHONE NUMBER ()		FAX NUMBER ()			
MULTI-JURISDICTIONAL PERSONAL HISTORY DISCLOSURE FORM ATTACHED? PRINCIPAL/KEY EMPLOYEE FORM - PENNSYLVANIA SUPPLEMENT TO THE MULTI-JURISDICTIONAL PERSONAL HISTORY DISCLOSURE FORM ATTACHED?							
FIRST NAME		MIDDLE NAME		LAST NAME		SUFFIX (JR., SR., ETC.)	
OCCUPATION		TITLE					
ADDRESS LINE 1		ADDRESS LINE 2					
ADDRESS LINE 3		CITY		STATE/PROVINCE		POSTAL CODE	
COUNTRY		EMAIL ADDRESS		PHONE NUMBER ()		FAX NUMBER ()	
MULTI-JURISDICTIONAL PERSONAL HISTORY DISCLOSURE FORM ATTACHED? PRINCIPAL/KEY EMPLOYEE FORM - PENNSYLVANIA SUPPLEMENT TO THE MULTI-JURISDICTIONAL PERSONAL HISTORY DISCLOSURE FORM ATTACHED?							
FIRST NAME		MIDDLE NAME		LAST NAME		SUFFIX (JR., SR., ETC.)	
OCCUPATION		TITLE					
ADDRESS LINE 1		ADDRESS LINE 2					
ADDRESS LINE 3		CITY		STATE/PROVINCE		POSTAL CODE	
COUNTRY		EMAIL ADDRESS		PHONE NUMBER ()		FAX NUMBER ()	
MULTI-JURISDICTIONAL PERSONAL HISTORY DISCLOSURE FORM ATTACHED? PRINCIPAL/KEY EMPLOYEE FORM - PENNSYLVANIA SUPPLEMENT TO THE MULTI-JURISDICTIONAL PERSONAL HISTORY DISCLOSURE FORM ATTACHED?							
FIRST NAME		MIDDLE NAME		LAST NAME		SUFFIX (JR., SR., ETC.)	
OCCUPATION		TITLE					
ADDRESS LINE 1		ADDRESS LINE 2					
ADDRESS LINE 3		CITY		STATE/PROVINCE		POSTAL CODE	
COUNTRY		EMAIL ADDRESS		PHONE NUMBER ()		FAX NUMBER ()	
MULTI-JURISDICTIONAL PERSONAL HISTORY DISCLOSURE FORM ATTACHED? PRINCIPAL/KEY EMPLOYEE FORM - PENNSYLVANIA SUPPLEMENT TO THE MULTI-JURISDICTIONAL PERSONAL HISTORY DISCLOSURE FORM ATTACHED?							

* MAKE ADDITIONAL COPIES AND ATTACH ADDITIONAL PAGES AS NECESSARY.

Initials
MS

SCHEDULE 3: ADDRESSES CURRENTLY USED BY APPLICANT

PROVIDE ALL ADDRESSES CURRENTLY USED BY APPLICANT.

Principal Place of Business					
ADDRESS PURPOSE					
ADDRESS LINE 1		ADDRESS LINE 2			
1111 West DeKalb Pike					
ADDRESS LINE 3		CITY	STATE/PROVINCE	POSTAL CODE	
		Wayne	PA	19087	
COUNTRY		PHONE NUMBER	FAX NUMBER		
		(570) 346-7651	(570) 344-1542		
ADDRESS PURPOSE					
ADDRESS LINE 1		ADDRESS LINE 2			
ADDRESS LINE 3		CITY	STATE/PROVINCE	POSTAL CODE	
COUNTRY		PHONE NUMBER	FAX NUMBER		
		()	()		
ADDRESS PURPOSE					
ADDRESS LINE 1		ADDRESS LINE 2			
ADDRESS LINE 3		CITY	STATE/PROVINCE	POSTAL CODE	
COUNTRY		PHONE NUMBER	FAX NUMBER		
		()	()		
ADDRESS PURPOSE					
ADDRESS LINE 1		ADDRESS LINE 2			
ADDRESS LINE 3		CITY	STATE/PROVINCE	POSTAL CODE	
COUNTRY		PHONE NUMBER	FAX NUMBER		
		()	()		

Initials KS

SCHEDULE 4: ADDRESSES USED BY APPLICANT

PROVIDE ALL ADDRESSES, OTHER THAN THOSE LISTED ON SCHEDULE 3, WHICH APPLICANT HAS USED OR FROM WHICH IT WAS CONDUCTING BUSINESS DURING THE LAST TEN (10) YEAR PERIOD, AND PROVIDE THE APPROXIMATE DATES DURING WHICH SUCH ADDRESSES WERE USED.

ADDRESS PURPOSE		ADDRESS USED FROM		ADDRESS USED TO	
Does Not Apply					
ADDRESS LINE 1		ADDRESS LINE 2			
ADDRESS LINE 3		CITY		STATE/PROVINCE	POSTAL CODE
COUNTRY	EMAIL ADDRESS	PHONE NUMBER	()	FAX NUMBER	()
ADDRESS PURPOSE		ADDRESS USED FROM		ADDRESS USED TO	
ADDRESS LINE 1		ADDRESS LINE 2			
ADDRESS LINE 3		CITY		STATE/PROVINCE	POSTAL CODE
COUNTRY	EMAIL ADDRESS	PHONE NUMBER	()	FAX NUMBER	()
ADDRESS PURPOSE		ADDRESS USED FROM		ADDRESS USED TO	
ADDRESS LINE 1		ADDRESS LINE 2			
ADDRESS LINE 3		CITY		STATE/PROVINCE	POSTAL CODE
COUNTRY	EMAIL ADDRESS	PHONE NUMBER	()	FAX NUMBER	()
ADDRESS PURPOSE		ADDRESS USED FROM		ADDRESS USED TO	
ADDRESS LINE 1		ADDRESS LINE 2			
ADDRESS LINE 3		CITY		STATE/PROVINCE	POSTAL CODE
COUNTRY	EMAIL ADDRESS	PHONE NUMBER	()	FAX NUMBER	()


Initials
YAS

SCHEDULE 5: CURRENT OFFICERS, DIRECTORS/PARTNERS AND TRUSTS

PROVIDE THE FOLLOWING INFORMATION FOR ALL OFFICERS, DIRECTORS/PARTNERS AND TRUSTEES, GRANTORS OR BENEFICIARIES OF A TRUST THAT IS REQUIRED TO BE LICENSED AS A PRINCIPAL UNDER THIS CHAPTER.

FIRST NAME		MIDDLE NAME		LAST NAME		SUFFIX (JR., SR., ETC.)		DATE OF BIRTH	
NONE									
ADDRESS LINE 1		ADDRESS LINE 2		CITY		STATE/PROVINCE		POSTAL CODE	
ADDRESS LINE 3									
COUNTRY		EMAIL ADDRESS		PHONE NUMBER ()		FAX NUMBER ()			
APPLICANT NAME: CURRENT TITLE OR POSITION									
ADDRESS LINE 1		ADDRESS LINE 2		CITY		STATE/PROVINCE		POSTAL CODE	
ADDRESS LINE 3									
COUNTRY		EMAIL ADDRESS		PHONE NUMBER ()		FAX NUMBER ()			
FROM DATE	TO DATE	TITLE OR POSITION	ANNUAL COMPENSATION'S VALUE	COMPOSITION OF COMPENSATION (SPECIFY SALARY, WAGES, COMMISSIONS, FEES, BONUS OR OTHER)					
MULTI-JURISDICTIONAL PERSONAL HISTORY DISCLOSURE FORM ATTACHED?				<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> YES <input type="checkbox"/> NO					
PRINCIPAL/KEY EMPLOYEE FORM - PENNSYLVANIA SUPPLEMENT TO THE MULTI-JURISDICTIONAL PERSONAL HISTORY DISCLOSURE FORM ATTACHED?									

* MAKE ADDITIONAL COPIES AND ATTACH ADDITIONAL PAGES AS NECESSARY.


 Initials

PROVIDE THE FOLLOWING INFORMATION FOR ALL OFFICERS, DIRECTORS/PARTNERS AND TRUSTEES WHO ARE NO LONGER ACTIVELY INVOLVED WITH APPLICANT BUT WHO HELD A POSITION DURING THE LAST TEN (10) YEAR PERIOD.

[illegible]

PGCB-CA-0912

Initials WVS

SCHEDULE 7: EMPLOYEES EARNING OVER \$250,000 IN ANNUAL COMPENSATION FROM APPLICANT

PROVIDE THE FOLLOWING INFORMATION FOR ALL EMPLOYEES EARNING OVER \$250,000 IN ANNUAL COMPENSATION FROM APPLICANT. DO NOT INCLUDE PERSONS ALREADY LISTED ON SCHEDULE 5.

EMPLOYEE NAME	APPLICANT NAME	LAST NAME	FIRST NAME	MIDDLE NAME	DATE OF BIRTH	DATE OF DEATH	DATE OF SERVICE	DATE OF RETIREMENT	DATE OF DEATH	DATE OF SERVICE	DATE OF RETIREMENT	DATE OF DEATH
Redacted												

* MAKE ADDITIONAL COPIES AND ATTACH ADDITIONAL PAGES AS NECESSARY

Initials WAS

SCHEDULE 8: BONUS, PROFIT SHARING, PENSION RETIREMENT, DEFERRED COMPENSATION & SIMILAR PLANS.

PROVIDE THE FOLLOWING INFORMATION AND ATTACH A DESCRIPTION OF PLANS AS APPENDIX '3'. ADDITIONALLY ATTACH AS APPENDIX 21 COPIES OF APPLICANT'S 5500 FORMS FILED WITH THE IRS FOR THE PAST FIVE (5) YEARS.

PLAN NAME OF PLAN	PLAN TYPE	PLAN YEAR	PLAN BALANCE
<h1>Redacted</h1>			

* MAKE ADDITIONAL COPIES AND ATTACH ADDITIONAL PAGES AS NECESSARY.


Initials

SCHEDULE 9: STOCK DESCRIPTION (FOR C CORPORATIONS, S-CORPORATIONS, LLCs)

PROVIDE THE FOLLOWING INFORMATION FOR ALL OF APPLICANT'S STOCK.

STOCK TYPE OR CLASS	NUMBER OF SHARES AUTHORIZED	NUMBER OF SHARES ISSUED	NUMBER OF SHARES OUTSTANDING	VOTING?	STOCK TYPES/CLASSES/INVENTORY	TERMS, CONDITIONS, RIGHTS AND PRIVILEGES
Redacted						

dyb
Initials

SCHEDULE 10: VOTING SHAREHOLDERS OR MEMBERS (FOR C CORPORATIONS, S-CORPORATIONS, LLCs)

PROVIDE THE FOLLOWING INFORMATION FOR EACH PERSON WHO HAS A CONTROLLING INTEREST AS THAT TERM IS DEFINED IN §1103 OF THE GAMING ACT, 58 P.A. CODE §401A.3 AND PROVIDED IN THE INSTRUCTIONS ON PAGE V.

NAME AND HOME ADDRESS
Redacted

* MAKE ADDITIONAL COPIES AND ATTACH ADDITIONAL PAGES AS NECESSARY..

[Signature]
Initials

SCHEDULE 10A: INTEREST OF CURRENT PARTNERS (FOR PARTNERSHIPS, LLPs, LIMITED PARTNERSHIPS, LLCs)

PROVIDE THE FOLLOWING INFORMATION FOR EACH PARTNER.

PARTNER NAME AND HOME ADDRESS
Redacted

* MAKE ADDITIONAL COPIES AND ATTACH ADDITIONAL PAGES AS NECESSARY.

SWP

SCHEDULE 10B: INTEREST OF FORMER PARTNERS (FOR PARTNERSHIPS, LLPs, LIMITED PARTNERSHIPS, LLCs)

PROVIDE THE FOLLOWING INFORMATION FOR EACH FORMER PARTNER FOR THE LAST TEN (10) YEARS.

FORMER PARTNER NAME AND HOME ADDRESS
Redacted

*MAKE ADDITIONAL COPIES AND ATTACH ADDITIONAL PAGES AS NECESSARY.

Initials *DDUS*

SCHEDULE 11: NON-VOTING SHAREHOLDERS OR MEMBERS (FOR C CORPORATIONS, S-CORPORATIONS, LLCs)

PROVIDE THE FOLLOWING INFORMATION FOR EACH PERSON WHO HAS CONTROLLING INTEREST AS THAT TERM IS DEFINED IN §1103 OF THE GAMING ACT, 58 PA. CODE §401A.3.

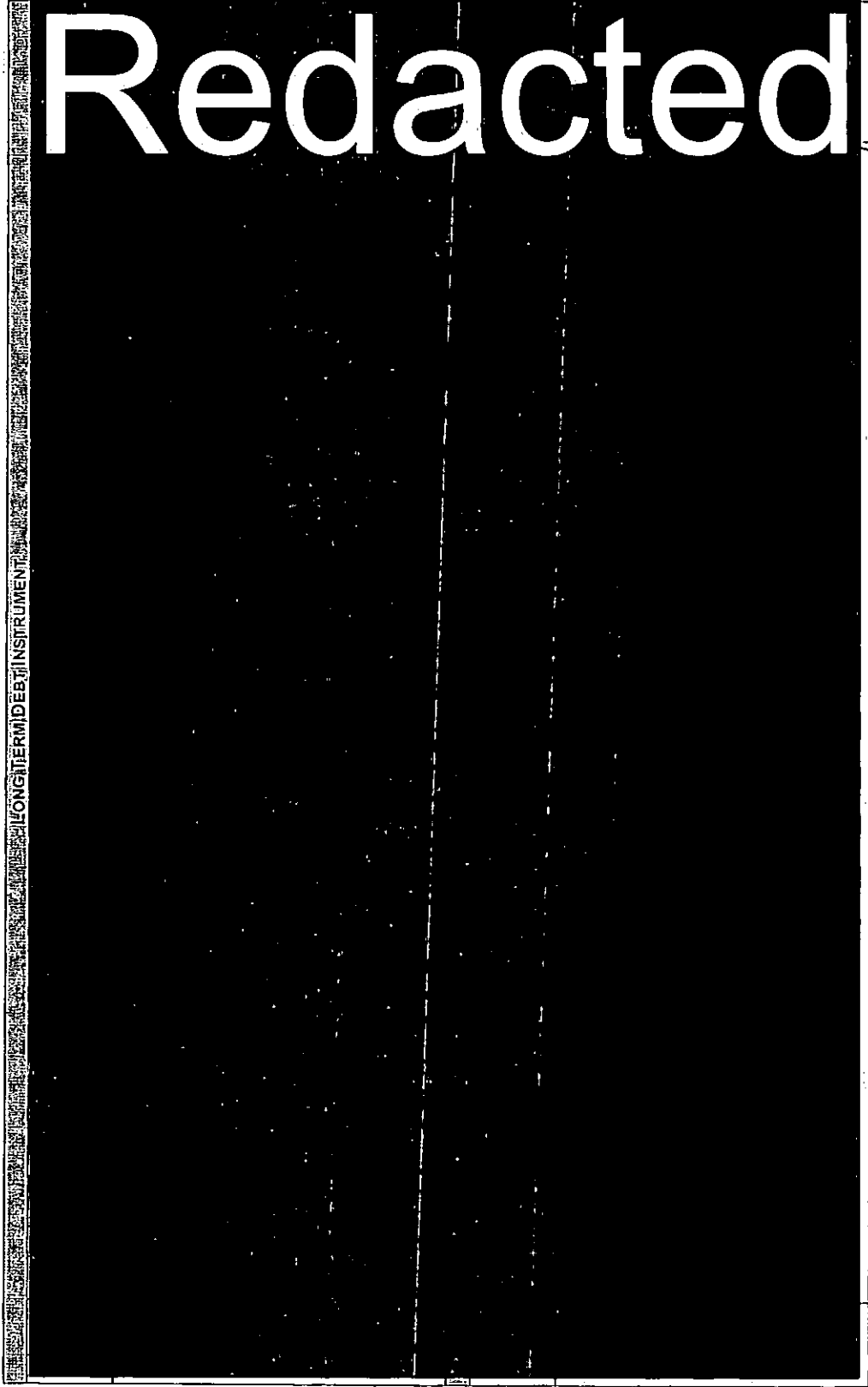
NAME AND HOME ADDRESS
Redacted

* MAKE ADDITIONAL COPIES AND ATTACH ADDITIONAL PAGES AS NECESSARY.

[Handwritten Signature]

SCHEDULE 12: LONG TERM DEBT

DESCRIBE THE NATURE, TYPE, COVENANTS AND PRIORITIES OF ALL OUTSTANDING BONDS, LOANS, MORTGAGES, TRUST DEEDS, NOTES, DEBENTURES OR OTHER FORMS OF INDEBTEDNESS ISSUED OR EXECUTED (INCLUDING LOANS MADE BY SHAREHOLDERS), OR TO BE ISSUED OR EXECUTED, BY THE APPLICANT, WHICH MATURE MORE THAN ONE YEAR FROM THE DATE OF ISSUANCE OR WHICH, BY THEIR TERMS, ARE RENEWABLE FOR A PERIOD OF MORE THAN ONE (1) YEAR FROM THE DATE OF ISSUANCE. ATTACH DESCRIPTION AND DOCUMENTATION AS APPENDIX 4.




Initials *[Signature]*

SCHEDULE 13: HOLDERS OF LONG TERM DEBT

PROVIDE THE FOLLOWING INFORMATION FOR EACH PERSON OR ENTITY HOLDING ANY OUTSTANDING BONDS, LOANS, MORTGAGES, TRUST DEEDS, NOTES, DEBENTURES OR OTHER FORMS OF INDEBTEDNESS EXECUTED OR ISSUED BY APPLICANT, WHICH MATURE MORE THAN ONE (1) YEAR FROM THE DATE OF ISSUANCE OR WHICH, BY THEIR TERMS, ARE RENEWABLE FOR A PERIOD OF MORE THAN ONE (1) YEAR FROM THE DATE OF ISSUANCE.

NAME AND ADDRESS
<div>Redacted</div>

* MAKE ADDITIONAL COPIES AND ATTACH ADDITIONAL PAGES AS NECESSARY.


Initials

SCHEDULE 14: OTHER INDEBTEDNESS AND SECURITY DEVICES

DESCRIBE THE NATURE, TYPE, TERMS, CONDITIONS AND COVENANTS OF ALL OUTSTANDING LOANS, MORTGAGES, TRUST DEEDS, PLEDGES, LINES OF CREDIT, OR OTHER EVIDENCE OF INDEBTEDNESS OR SECURITY DEVICES UTILIZED BY APPLICANT OTHER THAN THOSE DESCRIBED IN SCHEDULE 12. ATTACH DESCRIPTION AND DOCUMENTATION AS APPENDIX 5.

Redacted	
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Initials

SCHEDULE 15: HOLDER OF OTHER INDEBTEDNESS

PROVIDE THE FOLLOWING INFORMATION FOR EACH HOLDER OF ANY OUTSTANDING LOAN, MORTGAGE, TRUST DEED, PLEDGE OR OTHER EVIDENCE OF INDEBTEDNESS OR SECURITY DEVICES UTILIZED BY APPLICANT AND DESCRIBED IN RESPONSE TO SCHEDULE 14.

NAME AND ADDRESS	DATE	AMOUNT	TYPE OF DEBT	STATUS
<h1>Redacted</h1>				

* MAKE ADDITIONAL COPIES AND ATTACH ADDITIONAL PAGES AS NECESSARY.

Initials WDS

SCHEDULE 16: SECURITIES OPTIONS

PROVIDE THE FOLLOWING INFORMATION AND ATTACH AS APPENDIX 6.A DETAILED DESCRIPTION OF ANY OPTIONS EXISTING OR TO BE CREATED WITH RESPECT TO SECURITIES ISSUED BY APPLICANT WHICH DESCRIPTION SHALL INCLUDE, BUT NOT BE LIMITED TO, THE TITLE AND AMOUNT OF SECURITIES SUBJECT TO OPTION, THE YEAR OR YEARS DURING WHICH THE OPTIONS WERE OR WILL BE GRANTED, THE CONDITIONS UNDER WHICH THE OPTIONS WERE OR WILL BE GRANTED, THE CONSIDERATION FOR GRANTING THE OPTION AND THE YEAR OR YEARS DURING WHICH, AND THE TERMS UNDER WHICH, OPTIONEES BECAME OR WILL BECOME, ENTITLED TO EXERCISE THE OPTIONS, AND WHEN SUCH OPTIONS EXPIRE. (OR INCLUDE COPIES OF ANY OUTSTANDING OPTION PLANS OR PROXY STATEMENTS THAT PROVIDE THE REQUESTED INFORMATION.) NOTE: FOR THE PURPOSE OF THIS SCHEDULE, OPTION SHALL MEAN RIGHT, WARRANT OR OPTION TO SUBSCRIBE TO OR PURCHASE ANY SECURITIES ISSUED BY APPLICANT.

SECURITY	OPTION
<h1>Redacted</h1>	

* MAKE ADDITIONAL COPIES AND ATTACH ADDITIONAL PAGES AS NECESSARY.

Initials ADS

SCHEDULE 17: BENEFICIAL OWNER OF OPTIONS

PROVIDE THE FOLLOWING INFORMATION FOR PERSONS HOLDING THE OPTIONS DESCRIBED IN SCHEDULE 16.

OPTION	BENEFICIAL OWNER NAME	HOME ADDRESS
<h1>Redacted</h1>		

* MAKE ADDITIONAL COPIES AND ATTACH ADDITIONAL PAGES AS NECESSARY.

KWS
Initials

PROVIDE THE FOLLOWING INFORMATION FOR ALL PRINCIPALS NOT OTHERWISE DISCLOSED ON SCHEDULES 1, 5, 10, 10A, 11, 13 AND 15. INCLUDE INDIVIDUALS AND ENTITIES THAT HAVE A 1% OR GREATER INDIRECT OWNERSHIP INTEREST IN AN APPLICANT OR LICENSEE; HOWEVER, INDIVIDUALS OR ENTITIES WHO HOLD LESS THAN 5% OF THE VOTING SECURITIES OF AN APPLICANT OR LICENSEE OR AN INTERMEDIARY OR HOLDING COMPANY OF AN APPLICANT OR LICENSEE THAT IS A PUBLICLY TRADED COMPANY SHALL NOT BE REQUIRED TO BE LICENSED AS A PRINCIPAL.

FIRST NAME	MIDDLE NAME	LAST NAME		SUFFIX (JR., SR., ETC.)	DATE OF BIRTH
NONE					
ENTITY NAME					
ADDRESS LINE 1		ADDRESS LINE 2			
ADDRESS LINE 3		CITY	STATE/PROVINCE	POSTAL CODE	
COUNTRY	EMAIL ADDRESS	PHONE NUMBER ())	FAX NUMBER ())		
DESCRIBE NATURE, TYPE, TERMS AND CONDITIONS OF INTEREST IN OR CONTROL OVER APPLICANT.					
MULTI-JURISDICTIONAL PERSONAL HISTORY DISCLOSURE FORM ATTACHED?					
<input type="checkbox"/> YES <input type="checkbox"/> NO					
PRINCIPAL/KEY EMPLOYEE FORM - PENNSYLVANIA SUPPLEMENT TO THE MULTI-JURISDICTIONAL PERSONAL HISTORY DISCLOSURE FORM ATTACHED?					
<input type="checkbox"/> YES <input type="checkbox"/> NO					
PRINCIPAL ENTITY FORM ATTACHED?					
<input type="checkbox"/> YES <input type="checkbox"/> NO					

* MAKE ADDITIONAL COPIES AND ATTACH ADDITIONAL PAGES AS NECESSARY.

PGCB-CA-0912

39

Initials

SCHEDULE 19: FINANCIAL INSTITUTIONS

PROVIDE THE FOLLOWING INFORMATION WITH RESPECT TO EACH BANK, SAVINGS AND LOAN ASSOCIATION OR OTHER FINANCIAL INSTITUTION, WHETHER DOMESTIC OR FOREIGN, IN WHICH APPLICANT HAS OR HAS HAD AN ACCOUNT OVER THE LAST TEN (10) YEAR PERIOD REGARDLESS OF WHETHER SUCH ACCOUNT WAS HELD IN THE NAME OF APPLICANT, A NOMINEE OF APPLICANT OR WAS OTHERWISE UNDER THE DIRECT OR INDIRECT CONTROL OF APPLICANT.

NAME OF FINANCIAL INSTITUTION	NAME AND ADDRESS
<h1>Redacted</h1>	

* MAKE ADDITIONAL COPIES AND ATTACH ADDITIONAL PAGES AS NECESSARY.

dfjs

SCHEDULE 20: CONTRACTS

PROVIDE THE FOLLOWING INFORMATION WITH RESPECT TO ALL CONTRACTS OR AGREEMENTS (WHETHER WRITTEN OR ORAL) THAT APPLICANT HAS ENTERED INTO WITHIN THE PAST SIX (6) MONTHS, FOR GOODS AND/OR SERVICES IN EXCESS OF \$100,000. CONTRACTS AND AGREEMENTS DISCLOSED ELSEWHERE IN THIS APPLICATION NEED NOT BE PROVIDED ON THIS SCHEDULE.

NAME AND ADDRESS
Redacted

[Signature]
Initials

SCHEDULE 21: STOCK HELD BY APPLICANT

PROVIDE THE FOLLOWING INFORMATION WITH RESPECT TO EACH COMPANY IN WHICH APPLICANT HOLDS STOCK.

NAME & ADDRESS OF COMPANY	TYPE OF STOCK HELD	EXCHANGE	PURCHASE PRICE PER SHARE	NUMBER OF SHARES HELD	% OF OWNERSHIP IF MORE THAN 5%	TERMS, CONDITIONS, RIGHTS AND PRIVILEGES	VOTING?
Redacted							

[Signature]
Initials

PROVIDE THE FOLLOWING INFORMATION FOR EACH CHANGE IN THE BENEFICIAL OWNERSHIP OF THE EQUITY SECURITIES OF APPLICANT ON THE PART OF ANY PERSON WHO IS INDIRECTLY OR DIRECTLY A BENEFICIAL OWNER OF MORE THAN TEN PERCENT (10%) OF ANY CLASS OF AN EQUITY SECURITY OF APPLICANT OR WHO IS OR WAS WITHIN THAT PERIOD A DIRECTOR OR OFFICER OF APPLICANT THAT OCCURRED WITHIN THE FIVE (5) YEARS PRECEDING THIS APPLICATION. [INCLUDE CHANGES RESULTING FROM (A) GIFT, (B) PURCHASE, (C) SALE, (D) EXERCISE OF AN OPTION TO PURCHASE, (E) EXERCISE OF AN OPTION TO SELL, (F) GRANT OR RECEIPT OF A PUT OR (G) GRANT OR RECEIPT OF A CALL.]

[illegible]

* MAKE ADDITIONAL COPIES AND ATTACH ADDITIONAL PAGES AS NECESSARY.

initials

SCHEDULE 23: CRIMINAL HISTORY

IF APPLICANT ANSWERED YES TO QUESTIONS 1 OR 1A ON PAGE 7, PROVIDE THE FOLLOWING INFORMATION:

NAME OF CASE & DOCKET NUMBER		NATURE OF CHARGE OR COMPLAINT	DATE OF CHARGE OR COMPLAINT	DISPOSITION (ACQUITTED, CONVICTED, DISMISSED, ETC.)	NAME AND ADDRESS OF LAW ENFORCEMENT AGENCY OR COURT INVOLVED	SENTENCE	NAME OF OFFICER, DIRECTOR/PARTNER, TRUSTEE OR KEY EMPLOYEE
		None other than the minor summary offenses (i.e. speeding/moving violations), which are identified in the individual applications of Endeka Entertainment, LP's principals.					

[Handwritten Signature]

SCHEDULE 24: TESTIMONY, INVESTIGATIONS OR POLYGRAPHS

IF APPLICANT ANSWERED YES TO QUESTION 2 ON PAGES 7 AND 8, PROVIDE THE FOLLOWING INFORMATION:

TESTIMONY, INVESTIGATION OR POLYGRAPH INCIDENT

Redacted

Initials

SCHEDULE 25: EXISTING LITIGATION

PROVIDE THE FOLLOWING INFORMATION AND ATTACH AS APPENDIX 7 A DESCRIPTION OF ALL EXISTING CIVIL LITIGATION TO WHICH APPLICANT, ITS PARENT, AFFILIATE, OR SUBSIDIARY IS PRESENTLY A PARTY, WHETHER IN THIS COMMONWEALTH OR IN ANOTHER JURISDICTION. DO NOT INCLUDE ANY LITIGATION IN WHICH THE DAMAGES MAY NOT REASONABLY BE EXPECTED TO EXCEED \$100,000 OR LITIGATION IN WHICH DAMAGES MAY BE EXPECTED TO EXCEED \$100,000, BUT WHICH INVOLVES CLAIMS AGAINST APPLICANT WHICH ARE FULLY AND COMPLETELY COVERED UNDER AN INSURANCE POLICY HELD BY THE APPLICANT WITH A LICENSED INSURANCE CARRIER. THIS DESCRIPTION MUST INCLUDE THE TITLE AND DOCKET NUMBER OF THE LITIGATION, THE NAME AND LOCATION OF THE COURT BEFORE WHICH IT IS PENDING, THE IDENTITY OF ALL PARTIES TO THE LITIGATION AND THE GENERAL NATURE OF ALL CLAIMS BEING MADE.

NAME OF CASE AND DOCKET NUMBER Does Not Apply		EXISTING LITIGATION LOCATION AND NAME OF COURT BEFORE WHICH LITIGATION IS PENDING
NAMES OF ALL PARTIES TO LITIGATION		
NATURE OF THE CLAIMS		
NAME OF CASE AND DOCKET NUMBER		EXISTING LITIGATION LOCATION AND NAME OF COURT BEFORE WHICH LITIGATION IS PENDING
NAMES OF ALL PARTIES TO LITIGATION		
NATURE OF THE CLAIMS		

[Handwritten Signature]

SCHEDULE 26: ANTITRUST, TRADE REGULATION & SECURITY JUDGMENTS; STATUTORY AND REGULATORY VIOLATIONS

IF APPLICANT ANSWERED YES TO QUESTIONS 3 OR 4 ON PAGE 8, PROVIDE THE FOLLOWING INFORMATION:

NAME OF CASE & DOCKET NUMBER Does Not Apply to Endeke Entertainment, LP; however, see application of Penn National Gaming, Inc.	DATE OF JUDGMENT, ORDER OR DECREE	NAME AND ADDRESS OF AGENCY OR COURT INVOLVED
NATURE OF OFFENSE		
DISPOSITION <input checked="" type="checkbox"/> ACQUITTED <input type="checkbox"/> CONVICTED <input type="checkbox"/> DISMISSED <input type="checkbox"/> OTHER		
NATURE OF JUDGMENT, DECREE OR ORDER		
NAME OF CASE & DOCKET NUMBER	DATE OF JUDGMENT, ORDER OR DECREE	NAME AND ADDRESS OF AGENCY OR COURT INVOLVED
NATURE OF OFFENSE		
DISPOSITION <input type="checkbox"/> ACQUITTED <input type="checkbox"/> CONVICTED <input type="checkbox"/> DISMISSED <input type="checkbox"/> OTHER		
NATURE OF JUDGMENT, DECREE OR ORDER		

ALS
Initials

SCHEDULE 27: BANKRUPTCY OR INSOLVENCY PROCEEDINGS

IF APPLICANT ANSWERED YES TO QUESTIONS 5, 6 AND/OR 7 ON PAGE 8, PROVIDE THE FOLLOWING:


NAME OF CASE & DOCKET NUMBER		DATE PETITION FILED OR RELIEF SOUGHT	NAME AND ADDRESS OF AGENCY OR COURT INVOLVED
Does Not Apply		DATE JUDGMENT OR RELIEF ENTERED	NAME OF COURT APPOINTED RECEIVER, AGENT OR TRUSTEE DATE RECEIVER, AGENT OR TRUSTEE APPOINTED
NATURE OF JUDGMENT OR RELIEF			

[Signature]
Initials

SCHEDULE 28: NON-GAMING LICENSES AND PERMITS

IF APPLICANT ANSWERED YES TO QUESTION 8 ON PAGE 8, PROVIDE THE FOLLOWING INFORMATION FOR THE LAST TEN (10) YEAR PERIOD:

TYPE OF LICENSE OR PERMIT	NAME AND LOCATION OF GOVERNMENT AGENCY	APPLICATION NUMBER	DISPOSITION	DATE OF DISPOSITION	IF GRANTED, PROVIDE THE LICENSE/PERMIT NUMBER AND EXPIRATION DATE. IF DENIED, PENDING, EXPIRED, SUSPENDED, CONDITIONED, WITHDRAWN OR REVOKED, PROVIDE DETAILS.
Does Not Apply to Endeika Entertainment, LP; however, see application of Penn National Gaming, Inc.			<input type="checkbox"/> GRANTED <input type="checkbox"/> DENIED <input type="checkbox"/> PENDING <input type="checkbox"/> EXPIRED <input type="checkbox"/> SUSPENDED <input type="checkbox"/> CONDITIONED <input type="checkbox"/> WITHDRAWN <input type="checkbox"/> REVOKED		
			<input type="checkbox"/> GRANTED <input type="checkbox"/> DENIED <input type="checkbox"/> PENDING <input type="checkbox"/> EXPIRED <input type="checkbox"/> SUSPENDED <input type="checkbox"/> CONDITIONED <input type="checkbox"/> WITHDRAWN <input type="checkbox"/> REVOKED		
			<input type="checkbox"/> GRANTED <input type="checkbox"/> DENIED <input type="checkbox"/> PENDING <input type="checkbox"/> EXPIRED <input type="checkbox"/> SUSPENDED <input type="checkbox"/> CONDITIONED <input type="checkbox"/> WITHDRAWN <input type="checkbox"/> REVOKED		
			<input type="checkbox"/> GRANTED <input type="checkbox"/> DENIED <input type="checkbox"/> PENDING <input type="checkbox"/> EXPIRED <input type="checkbox"/> SUSPENDED <input type="checkbox"/> CONDITIONED <input type="checkbox"/> WITHDRAWN <input type="checkbox"/> REVOKED		


 Initials

SCHEDULE 29: GAMING LICENSES AND PERMITS

IF APPLICANT ANSWERED YES TO QUESTION 9 ON PAGE 9 PROVIDE THE FOLLOWING INFORMATION FOR THE LAST TEN (10) YEAR PERIOD:

APPLICANT LICENSING (GOVERNMENT ISSUED GAMING)					IF GRANTED, PROVIDE THE LICENSE/PERMIT NUMBER AND EXPIRATION DATE. IF DENIED, PENDING, EXPIRED, SUSPENDED, CONDITIONED, WITHDRAWN OR REVOKED, PROVIDE DETAILS.
TYPE OF LICENSE OR PERMIT	NAME AND LOCATION OF GOVERNMENT AGENCY	APPLICATION NUMBER	DISPOSITION	DATE OF DISPOSITION	
License to Conduct a Harness Racing Meeting with Pari-Mutuel Wagering	PHRC		<input checked="" type="checkbox"/> GRANTED <input type="checkbox"/> DENIED <input type="checkbox"/> PENDING <input type="checkbox"/> EXPIRED <input type="checkbox"/> SUSPENDED <input type="checkbox"/> CONDITIONED <input type="checkbox"/> WITHDRAWN <input type="checkbox"/> REVOKED	July 12, 2012	Granted by the Pennsylvania Harness Racing Commission to American Harness Racing Tracks, LLC. See attached order.
See also application of Penn National Gaming, Inc.			<input type="checkbox"/> GRANTED <input type="checkbox"/> DENIED <input type="checkbox"/> PENDING <input type="checkbox"/> EXPIRED <input type="checkbox"/> SUSPENDED <input type="checkbox"/> CONDITIONED <input type="checkbox"/> WITHDRAWN <input type="checkbox"/> REVOKED		
			<input type="checkbox"/> GRANTED <input type="checkbox"/> DENIED <input type="checkbox"/> PENDING <input type="checkbox"/> EXPIRED <input type="checkbox"/> SUSPENDED <input type="checkbox"/> CONDITIONED <input type="checkbox"/> WITHDRAWN <input type="checkbox"/> REVOKED		
			<input type="checkbox"/> GRANTED <input type="checkbox"/> DENIED <input type="checkbox"/> PENDING <input type="checkbox"/> EXPIRED <input type="checkbox"/> SUSPENDED <input type="checkbox"/> CONDITIONED <input type="checkbox"/> WITHDRAWN <input type="checkbox"/> REVOKED		

Initials PHS

SCHEDULE 30: APPLICANT'S CONTRIBUTIONS AND DISBURSEMENTS

IF APPLICANT ANSWERED YES TO ANY OF QUESTIONS 10 THROUGH 16 ON PAGES 9 AND 10, PROVIDE THE FOLLOWING INFORMATION FOR ANY PRESENT OR FORMER DIRECTORS, OFFICERS, EMPLOYEES OR THIRD PARTIES WHO WOULD HAVE KNOWLEDGE OR INFORMATION OF THE CONTRIBUTIONS AND/OR DISBURSEMENTS DURING THE LAST TEN (10) YEAR PERIOD:

ALSO PROVIDE THE NAME, ADDRESS, DATE FORMED AND OFFICERS OF ANY POLITICAL ACTION COMMITTEE DURING THE LAST TEN (10) YEAR PERIOD. PROVIDE COPIES OF ANY REPORTS FILED BY THE COMMITTEE DURING THE LAST FIVE (5) YEARS, WHETHER FEDERAL OR STATE.

IF "INDEPENDENT EXPENDITURES" HAVE BEEN MADE, PROVIDE A DETAILED LIST SHOWING: 1-DATE MADE, 2-RECIPIENT OF THE EXPENDITURE, 3-AMOUNT OF THE EXPENDITURE 4- THE ELECTION IT WAS INTENDED TO INFLUENCE.

Redacted

Initials
40/15

SCHEDULE 32: BUSINESS BACKGROUND PART 2

DESCRIPTION OF BUSINESS DEVELOPMENTS INCLUDING BANKRUPTCY, RECEIVERSHIP OR SIMILAR PROCEEDINGS	Does Not Apply
DESCRIPTION OF ANY OTHER MATERIAL REORGANIZATION, READJUSTMENT OR SUCCESSION OF APPLICANT OR ANY OF ITS SUBSIDIARIES OR ACQUISITIONS	Does Not Apply
HISTORY OF PREVIOUS BUSINESS CONDUCTED BY APPLICANT	Does Not Apply

Initials MB

DIVERSITY PLAN STATEMENT

SLOT MACHINE LICENSE APPLICANT NAME Endeka Entertainment, LP

SLOT MACHINE LICENSE APPLICANT MAILING ADDRESS 1111 West DeKalb Pike,
Wayne, PA 19087

SLOT MACHINE LICENSE APPLICANT PHONE NUMBER (570) 346-7651

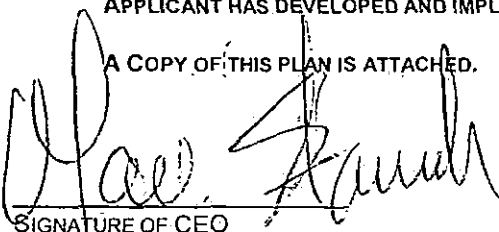
EQUAL OPPORTUNITY OFFICER _____

DATE SUBMITTED / /

PURSUANT TO SECTION 1325(B)(1) OF THE PENNSYLVANIA RACE HORSE DEVELOPMENT AND GAMING ACT:

APPLICANT HAS DEVELOPED AND IMPLEMENTED A DIVERSITY PLAN.

A COPY OF THIS PLAN IS ATTACHED.


SIGNATURE OF CEO

PRINTED NAME

S, 30, B

DATE

2013 Diversity Plan
For
Lawrence Downs Casino and Racing Resort

Revised May 29, 2013

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INTRODUCTION

Endeka Entertainment, LP in association with Penn National Gaming Inc. (Penn) has developed this comprehensive Diversity Plan for the construction and operations of the proposed Lawrence Downs Casino and Racing Resort ("Lawrence Downs Casino"). The plan is designed not only to provide equal opportunity for vendors, suppliers and employees, but to proactively seek out individuals and businesses from traditionally disadvantaged groups for casino jobs and construction/supplier contracts.

While the Plan refers frequently to "MBE" and "WBE" companies, the inclusive diversity philosophy of Lawrence Downs Casino is intended to be more far reaching than simply the inclusion of minorities and women. Our philosophy is to maximize the concept of inclusiveness in building our employment base and supplier network. This plan will refer to this broader concept of inclusion by the designation "other diverse groups."

EXECUTIVE SUMMARY

Purpose

This Plan describes the Lawrence Downs Casino's strong commitment to ensure diversity in the construction and operation of the property. The Plan outlines specific procedures aimed at ensuring equal opportunity, and diversity in employment, contracting, operations and in community relations activities. The Plan emphasizes our commitment to diversity as it relates to our employees, our vendors, our business partners and our community. In sum, we appreciate and respect diversity in all aspects of our business operations and we look forward to supporting and participating in the local community as we build a regional engine of economic growth.

Diversity Committee

Lawrence Downs Casino will establish a Diversity Committee to oversee all diversity initiatives for the company if selected to be a Category 2 slot licensee. The Committee will be responsible for advancing the diversity and inclusion strategy by setting strategic direction and managing all aspects of the strategy. The General Manager will chair the Committee, which will be comprised of members of senior management including purchasing and construction personnel.

Our Strategy for Success

Our overall strategy will enable Lawrence Downs Casino to further develop and implement the Plan in order to drive achievement of positive business results and meet the twin goals of ensuring equal opportunity and promoting diversity in a manner that reflects the diversity of the region. The four focus areas of the Plan are:

➤ Construction

- Build and enhance relationships within the community to raise awareness and identify qualified MBE/WBE contractors and suppliers.
 - Liaison with the Western Pennsylvania Minority Supplier Development Counsel (WPMSDC), Pittsburgh's Equal Opportunity Review Commission, the Allegheny County Department of Minority, Women and Disadvantaged Business Enterprise and similar State and regional organizations
- Ensure that all qualified vendors are given equal access to bid on planned new construction and any future expansion projects.

➤ Procurement/Vendor Purchasing

- Build and enhance relationships within the community to raise awareness and identify qualified MBE/WBE vendors.
- Ensure that all qualified vendors are given equal access to bid on contracts and purchases.

➤ Employment

- Build and enhance relationships within the community to raise awareness and identify potential candidates from historically disadvantaged groups for employment.
- Foster an inclusive work environment that results in both personal and business success.
- Provide training opportunities to give employees the skills and experience necessary to move into supervisory and management positions that offer higher pay and more responsibility.

➤ **Community Involvement**

- Support our community and be a responsible corporate citizen.
- Encourage participation in community initiatives across the entire organization including supporting organizations that serve and represent historically disadvantaged persons and groups.

DEFINITIONS

Diversity refers to the variety of backgrounds and characteristics found in society today; thus it embraces all aspects of human similarities and differences. While we support diversity as an inclusion concept, reality compels us to focus considerable attention on addressing issues related to those individuals and groups that have historically been adversely affected. For purposes of the Plan, diversity specifically focuses on differences among people with respect to age, sex, culture, race, ethnicity, religion, color, disability, national origin, ancestry, sexual orientation and veteran status.

Definition of Minority

For purposes of MBE's and WBE's, a minority is an individual who is a member of the following ethnic groups: African American, Asian American, Hispanic American, Native American and females regardless of race or ethnicity.

Definition of Participation Plan

An obligation imposed by a licensed entity or applicant as part of its contract with a contractor that requires the contractor to perform the contract through the utilization of minority or women owned business enterprises.

Definition of Minority Business Enterprise ("MBE") and Woman Business Enterprise ("WBE")

Minority and female enterprises that meet the guidelines set by the Pennsylvania Department of General Services Bureau of Minority and Women Business Opportunity or other similar organization.

CONSTRUCTION

Construction Mission

Inclusion of minority businesses and other diverse groups on bids for major construction projects is an important issue for the substantial local minority community and for Lawrence Downs Casino. We will use a proactive approach to address minority participation during the initial casino build to ensure the inclusion of minority businesses and the successful completion of the project. Once operating we will continue that framework for any future construction projects at the resort.

Good Faith Plan for Minority Construction Participation

There are a number of factors that will be integral to our success in including the minority contractors and suppliers in the initial build out of Lawrence Downs Casino. We intend to employ the following steps in the construction of this project:

- Selection of third party and in-house construction managers who share our commitment to minority participation. This will be determined through the construction manager interview process.
- Utilization of diversity consultants with knowledge of the Western PA construction market.
- Close and continuous coordination with property-level and corporate purchasing departments as well as the Government Affairs department in order to capitalize on their continuous search for qualified minority enterprises.
- Use of State of Pennsylvania, PA Gaming Control Board and other resources and databases to identify capable minority contractors and suppliers.
- Continuation of specific procedures and processes that require construction managers to demonstrate efforts to identify minority contractors and suppliers before work is awarded.
- Effective up front requirements on the part of construction managers to provide minority contractors and suppliers opportunities to bid as well as reporting procedures to track commitments to, and dollars expended for, such minority contractors and suppliers.
- Increased concentration and coordination with construction managers to identify 2nd and 3rd tier subcontractor and supplier opportunities.
- Diligent tracking to ensure the fulfillment of minority contractor and supplier participation plan commitments made by construction managers and 1st tier subcontractors.

PROCUREMENT

Purchasing Mission

Lawrence Downs Casino will consider quality, service, dependability and price as the main components of any vendor relationship. Further, as a socially responsible organization, we pledge to partner wherever possible with minority and woman vendors, as well as other Diverse Groups, to create a mutually beneficial business climate. Our goal is to ensure that all qualified vendors are given equal opportunity to bid on products and services to be utilized at Lawrence Downs Casino.

Good Faith Plan for Minority Vendor Participation

In support of our diverse vendor purchasing mission, Lawrence Downs Casino will undertake the following initiatives:

- Utilize the Pennsylvania Department of General Services Bureau of Minority and Women Business Opportunity business directory and database; and resources of the Western Pennsylvania Minority Supplier Development Council (WPMSDC), Pittsburgh's Equal Opportunity Review Commission, the Allegheny County Department of Minority, Women and Disadvantaged Business Enterprise and similar State and regional organizations
- Link our website to those of the Pennsylvania Department of General Services Bureau of Minority and Women Business Opportunity, WPMSDC and other regional websites promoting diversity in contracting and employment to facilitate awareness and to simplify the application process for potential vendors.
- Create a point of sale brochure entitled *How to Do Business with Lawrence Downs Casino* to summarize our diverse vendor purchasing program.
- Participate in events sponsored by the Pennsylvania Department of General Services Bureau of Minority and Women Business Opportunity development, WPMSDC and similar organizations such as seminars, trade shows and training sessions and reverse trade shows to expand awareness of our minority vendor purchasing program.
- Attend and support Pennsylvania regional minority business fairs organized by the Minority Supplier Diversity Council of Pennsylvania and Ohio, the African-American Chamber of Commerce and area Chambers of Commerce.
- Periodically review the Pennsylvania Department of General Services Bureau of Minority and Women Business Opportunity list of approved vendors for any changes.
- Provide access to the applications and contact information of the Pennsylvania Department of General Services Bureau of Minority and Women Business and

WPMSSDC. This will provide an opportunity for uncertified potential vendors to become certified.

- Create a mentoring environment that will help new vendors understand the daily workings of the property's operations.
- Request user departments to review their annual budgets for purchasing opportunities, work with the minority database and reach out to those minority suppliers provided by the purchasing staff.
- Establish a reasonable payment plan, agreed upon by both the vendor and the Manager of Purchasing after review of the financial status of diverse vendors.
- Establish a program that will encourage existing minority and other diverse vendors to expand the product lines they sell us through a mentoring process.
- Consider minority and women-owned business enterprises when reviewing Capital Expenditure projects.

Lawrence Downs Casino will follow these initiatives and develop others as it strives to create an inclusive business environment.

Vendor Requirements

Lawrence Downs Casino endeavors to have all vendors complete a vendor registration packet before any contract or purchase order will be issued, such registration will include information on MBE/WBE status.

Purchasing Objective:

These extensive efforts to identify, train and assist MBE/WBE, as well as other diverse groups of potential vendors should result in a roster of vendors that maximizes diversity and is reasonably reflective of and inclusive of the local community.

EMPLOYMENT

WORKFORCE DIVERSITY

Employment Mission

Recruiting will involve job fairs, various community partnerships to include higher education, chambers of commerce, government agencies and targeted recruiting of minorities and other diverse groups from both new and existing gaming markets. We may also utilize programs and agencies such as the Junior Achievement, Mock Interviews, Soft Skills Presentations, Referral Bonus Programs and local minority agencies such as the African American Chamber of Commerce and Latino Professional organizations to the extent that such organizations are active in the local area. We will also engage statewide minority advocacy organizations for our recruitment efforts.

Advertising for open positions will include a broad range of diverse media sources that may include print, radio, television and internet. To the extent that such sources exist in the local area, we will specifically direct some of this advertising to media sources targeted toward minority groups.

We will publish a bi-weekly Human Resources "Hot Sheet" detailing all position openings as they become open. The Hot Sheets will be sent to area high schools, colleges, employment agencies, minority organizations and social agencies as well as advertised on public sources including our internet website. New casino positions will also be offered to qualified existing resort employees who have interest in them.

Employment Goals

Lawrence Downs Casino will strive to maintain a workforce that reasonably reflects the diverse elements of our community and surrounding area.

TRAINING, DEVELOPMENT & RETENTION EFFORTS

Our education and training efforts will have several areas of focus to help develop a high-functioning, service-oriented diverse workforce. Lawrence Downs Casino will provide best practice training to ensure consistency with our EEO recruiting & hiring practices. We will conduct diversity training designed to foster a welcoming environment for all and reinforce respect in the workplace. We will also provide training to the management team on how to be a culturally sensitive manager with focus on consistency and fairness in the workplace, generational diversity, cultural diversity, and how to manage effective teams in a diverse, service environment. We will integrate diversity and respect into our mandatory orientation program. In addition to this broad, property-wide training, we will provide departmental skill-related training for our new associates. This will allow team members to successfully integrate themselves into their new departments. Building confidence in the ability to competently handle job duties and

establishing an internal departmental support system will increase the chances of retaining new team members.

Team members want to stay with companies that provide development and mobility options. They are loyal to organizations that invest in their careers. We are committed to being that kind of company. We will make the promotion of our employees a first option for upward mobility. We also plan on providing various mobility programs allowing our employees to grow and advance within the company. A Management Apprentice Program will be available for line level team members who aspire to management positions, and are deemed "high potential." Advanced management skill-related courses will be available for our supervisors and managers who aspire to advance and become more proficient in their current positions.

WORKPLACE INCLUSION

Fostering an inclusive environment is the responsibility of all leadership. It is also a journey that will continue moving forward forever. The world in which we live is ever-changing, and the company needs to continue to be aware of these changes and to create a welcoming environment where all team members feel valued and respected.

Our plan is to weave diversity through all areas of the team member environment at Lawrence Downs Casino. We will request of, and focus on, ensuring that our leadership considers diverse perspectives in decisions that affect our team members. Seeking input from everyone and remembering that creativity is driven by a diversity of experiences and such diversity assists in achieving better overall decisions. We want to provide an environment that inspires and engages team members to reach their full career potential.

We will challenge Lawrence Downs Casino managers to truly get to know and learn about their team members. Discovering unique skills and talents will assist with developing creative solutions, plus build loyalty between managers and their team members. We will also ask that managers share their own personal skills and talents to create two way dialogues going both up and down the organization.

Overall, we will strive to create the awareness that diversity is not just another initiative. Rather, it is a way of doing business and if integrated into everything we do, will assist us in not only becoming the employer of choice but also the casino of choice for our customers. A diverse employee base better understands our diverse guest base, their cultural sensitivities and expectations. Such understanding enhances the guest experience and thus satisfaction which will lead to greater business success for the resort its employees and its vendors.

COMMUNITY AFFAIRS/CHARITABLE CONTRIBUTIONS

Lawrence Downs Casino and Penn Partnership - 35 Years of History in Supporting the Community

Endeka Entertainment, LP has partnered with Penn National Gaming, Inc. whose corporate office is based in Wyomissing Pennsylvania. Penn National will construct and consult on the management of the operation. Lawrence Downs Casino through its association with Penn will become an involved corporate citizen in the state of Pennsylvania. The Lawrence Downs Casino/Penn partnership will leverage Penn's corporate level involvement in high profile initiatives. Penn National Gaming, Inc. has a long standing tradition of supporting Central Pennsylvania community initiatives and Lawrence Downs Casino, partnered with Penn, will expand that involvement to Western Pennsylvania.

COMMITMENT

Endeka Entertainment, LP and Penn National Gaming represent a team committed to developing a high performance, inclusive work environment that reflects the diversity of our community. We will strive to create a company culture where all ideas and all contributions are valued no matter how or from whom they may originate. We will actively seek out employees and vendors from traditionally disadvantaged groups to staff, build and supply the facility. Our commitment to making inclusiveness the foundation for our culture is driven not only from our desire to enhance our community, but also because such commitment supports a sound business strategy. This diverse working culture includes not only our valued workforce, but also offers opportunities for broad participation to diverse groups in the procurement of goods and services.

Appendix A

Equal Employment Opportunity (Penn National Gaming, Inc.)

Effective Date: 1/1/1999

Revision Date: 5/1/2006

To give equal employment and advancement opportunities to all employees and applicants, the Company makes employment decisions based on each person's performance, qualifications, and abilities. We do not discriminate in employment opportunities or practices on the basis of race, color, religion, gender, national origin, age, disability, or any other characteristic protected by law.

The Company will make reasonable accommodations for qualified individuals with known disabilities unless making the reasonable accommodation would result in an undue hardship to the property.

This Equal Employment Opportunity policy covers all employment practices, including selection, job assignment, compensation, discipline, separation of employment, and access to benefits and training.

If you have a question about any type of discrimination at work, please promptly notify your immediate supervisor or your Human Resources Department. You will not be punished for asking questions about this. If we determine that anyone was illegally discriminating, that person will be subject to disciplinary action, up to and including separation of employment.

Disability Accommodation

Effective Date: 1/1/1999

Revision Date: 5/1/2006

The Company is committed to complying fully with the Americans with Disabilities Act ("ADA"). We are also committed to ensuring equal opportunity in employment for qualified persons with disabilities. We conduct all our employment practices and activities on a non-discriminatory basis.

Our hiring procedures provide meaningful employment opportunities for persons with disabilities. We only make pre-employment inquiries regarding an applicant's ability to perform the duties of the job.

Reasonable accommodation is available to an employee with a disability when the disability affects the performance of essential job functions. We make our employment decisions based on the merits of the situation in accordance with defined criteria, not the disability of the individual.

Qualified individuals with disabilities are entitled to equal pay and other forms of compensation (or changes in compensation) as well as job assignments, classifications, organizational structures, position descriptions, lines of progression, and seniority lists. We make leaves of absence available to all employees on an equal basis in accordance with applicable federal and state laws.

The Company is also committed to not discriminating against any qualified employee or applicant because the person is related to or associated with a person with a disability. The Company follows any state or local law that gives more protection to a person with a disability than the ADA gives.

The Company is committed to taking all other actions that are necessary to ensure equal employment opportunity for persons with disabilities in accordance with the ADA and any other applicable federal, state, and local laws.

Policy No. 103



Pennsylvania Gaming Control Board
Licensed Entity Representation Registration

A Licensed Entity Representative includes any person acting on behalf of or representing the interest of any applicant, licensee, permittee or registrant, including but not limited to an attorney (outside counsel representing the applicant/licensee), agent or lobbyist regarding any matter which may reasonably be expected to come before the Pennsylvania Gaming Control Board ("PGCB"). Please include representatives from law firms, public relations firms, representatives from government relations firms and traffic experts. If any law firms were sub-contracted, individuals from these firms who directly represented the applicant/licensee must also complete this form.

NAME:	James A. Doherty, III
FIRM:	Doherty Hayes, LLC
ADDRESS:	217 Wyoming Avenue
CITY:	Scranton
STATE AND ZIP CODE:	PA 18503
TELEPHONE:	(570) 346-7651
ENTITY REPRESENTED:	Endeka Entertainment, LP

Pursuant to 4 Pa.C.S., §1202.1(b), I am required to register as a licensed entity representative with the PGCB. I have an ongoing duty to regularly update this information and failure to do so could subject my firm and me to a penalty. I also acknowledge that by signing this document, all information contained herein will be made available for review by the public and that such information will be posted on the PGCB website pursuant to 4 Pa.C.S., §1202.1(3).

SIGNATURE: _____

DATE: _____

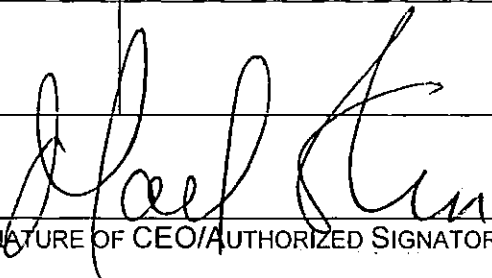
PENNSYLVANIA POLITICAL CONTRIBUTIONS FORM

IN THE CHART BELOW, PROVIDE THE REQUIRED INFORMATION FOR ALL POLITICAL CONTRIBUTIONS, MONETARY OR IN-KIND, TO A CANDIDATE FOR NOMINATION OR ELECTION TO ANY PUBLIC OFFICE IN THIS COMMONWEALTH, OR TO ANY POLITICAL COMMITTEE OR STATE PARTY IN THIS COMMONWEALTH OR TO ANY GROUP, COMMITTEE OR ASSOCIATION ORGANIZED IN SUPPORT OF ANY SUCH CANDIDATE, POLITICAL COMMITTEE OR STATE PARTY ON OR AFTER THE DATE YOUR ENTITY'S APPLICATION WAS SUBMITTED TO THE PENNSYLVANIA GAMING CONTROL BOARD (BOARD). THE APPLICANT OR LICENSEE MUST LIST POLITICAL CONTRIBUTIONS BY ITS AFFILIATES, INTERMEDIARIES, SUBSIDIARIES, HOLDING COMPANIES, PRINCIPALS AND KEY EMPLOYEES WHO HOLD SIMILAR GAMING LICENSES IN OTHER JURISDICTIONS. DO NOT INCLUDE CONTRIBUTIONS TO CANDIDATES FOR FEDERAL OFFICES OR TO COMMITTEES OR GROUPS ORGANIZED SOLELY IN SUPPORT OF FEDERAL CANDIDATES.

IF THERE IS MORE THAN ONE CONTRIBUTION TO THE SAME CANDIDATE, POLITICAL COMMITTEE, STATE PARTY, ETC., SEPARATE ENTRIES MUST BE LISTED FOR EACH CONTRIBUTION.

NOTE: IF YOU NEED SPACE FOR ADDITIONAL ENTRIES, PLEASE MAKE ADDITIONAL COPIES OF THIS FORM.

DATE OF CONTRIBUTION	NAME AND ADDRESS OF THE CANDIDATE, POLITICAL COMMITTEE OR STATE PARTY, OR GROUP, COMMITTEE OR ASSOCIATION ORGANIZED IN SUPPORT OF SUCH CANDIDATE, POLITICAL COMMITTEE OR STATE PARTY	AMOUNT OR VALUE OF CONTRIBUTION
	Does not apply	


 SIGNATURE OF CEO/AUTHORIZED SIGNATORY

7-2-13
 DATE SIGNED

Manuel Stamatakis CEO/Shareholder
 PRINTED NAME OF CEO/AUTHORIZED SIGNATORY – TITLE

*IF A PERSON OTHER THAN THE CEO OF THIS ENTITY IS DESIGNATED TO EXECUTE THIS DOCUMENT, THE BOARD MUST BE PROVIDED WITH A RESOLUTION OR AN AFFIDAVIT, CERTIFIED AS TRUE AND CORRECT, IDENTIFYING THE INDIVIDUAL SO DESIGNATED, AUTHORIZING THAT INDIVIDUAL TO EXECUTE THE DOCUMENT ON BEHALF OF BOTH THE ENTITY AND THE CEO.

APPENDIX 1

**DESCRIPTION OF THE BUSINESS CURRENTLY PERFORMED AND THE
BUSINESS INTENDED TO BE PERFORMED IN THE COMMONWEALTH**

Endeka Entertainment, LP ("Endeka") was formed in the spring of 2012 for the purpose of submitting a petition to transfer the stock of American Harness Tracks, LLC in order that Endeka may submit an application for a license to conduct a Harness Horse Racing Meeting with Pari-Mutuel Waging with the Pennsylvania Harness Racing Commission ("PHRC").

If approved for licensure by the Pennsylvania Gaming Control Board ("PGCB"), Endeka intends to open and operate a first-class Category 1 slot machine facility in Lawrence County, Pennsylvania. This proposed "racino" will be a fully integrated facility that will promote synergy between both racing and gaming activities.

APPENDIX 2

**DESCRIPTION OF ANY FORMER BUSINESS ENGAGED
BY THE APPLICANT IN THE LAST TEN (10) YEARS**

Redacted

APPENDIX 3

**DESCRIPTION OF ALL BONUS, PROFIT SHARING, PENSION, RETIREMENT,
DEFERRED COMPENSATION AND SIMILAR PLANS**

Redacted

APPENDIX 4

DESCRIPTION OF LONG-TERM DEBT

Redacted

APPENDIX 5

DESCRIPTION OF OTHER INDEBTEDNESS AND SECURITY DEVICES

Redacted

APPENDIX 6

DESCRIPTION OF SECURITIES OPTIONS

Redacted

APPENDIX 7

DESCRIPTION OF EXISTING LITIGATION

Redacted

APPENDIX 8

AUDITED FINANCIAL STATEMENT FOR THE LAST FISCAL YEAR

Redacted

APPENDIX 9

AUDITED FINANCIAL STATEMENTS FOR THE LAST FIVE (5) YEARS

Redacted

ENDEKA ENTERTAINMENT, LP
APPENDIX 10

APPENDIX 10

ANNUAL REPORTS FOR THE LAST FIVE (5) YEARS

Redacted

APPENDIX 11A

**ANNUAL REPORTS PREPARED ON THE SEC'S 10K
FOR THE LAST FIVE (5) YEARS**

Does not apply.

APPENDIX 11B

**COPIES OF ANNUAL OR QUARTERLY FINDINGS FOR THE LAST FIVE (5) YEARS
REQUIRED UNDER THE LAWS OF A REGULATORY AGENCY OF ANOTHER
COUNTRY**

Does not apply.

APPENDIX 12

A COPY OF THE LAST QUARTERLY UNADITED FINANCIAL STATEMENT

Redacted

APPENDIX 13

A COPY OR COPIES OF ANY INTERIM REPORTS

Redacted

APPENDIX 15

**A COPY OF ALL REGISTRATION STATEMENTS FOR THE LAST FIVE (5) YEARS
FILED IN ACCORDANCE WITH THE SECURITIES ACT OF 1933**

Does not apply.

APPENDIX 16

**COPIES OF ALL OTHER REPORTS PREPARED IN THE LAST FIVE (5) YEARS BY
INDEPENDENT AUDITORS OF THE APPLICANT**

Redacted

- APPENDIX 17

**CERTIFIED COPIES OF THE ARTICLES OF INCORPORATION, CHARTER, BY-
LAWS, PARTNERSHIP AGREEMENT OR OTHER OFFICIAL DOCUMENTS AND
ALL AMENDMENTS AND PROPOSED AMENDMENTS**

Redacted

See Exhibit "B". Certificate of Limited Partnership

PENNSYLVANIA DEPARTMENT OF STATE
CORPORATION BUREAU

Certificate of Limited Partnership
(15 Pa.C.S. § 8511)

For
1
Add
65
PENNCORP SERVICEGROUP, INC.
600 NORTH SECOND STREET
PO BOX 1210
HARRISBURG, PA 17108-1210

Document will be returned to the
name and address you enter in
the left
=

Commonwealth of Pennsylvania
CERTIFICATE OF LIMITED PARTNERSHIP 2 Page(s)



Fee: \$125

In compliance with the requirements of 15 Pa.C.S. § 8511 (relating to certificate of limited partnership), the undersigned, desiring to form a limited partnership, hereby certifies that:

1. The name of the limited partnership (may contain the word "company", or "limited" or "limited partnership" or any abbreviation):

Endeka Entertainment LP

2. The (a) address of the limited partnership's initial registered office in this Commonwealth or (b) name of its commercial registered office provider and the county of venue is:

(a) Number and Street City State Zip County
1111 W. Dekalb Pike, Wayne, PA 19087 Delaware

(b) Name of Commercial Registered Office Provider County,
etc.

3. The name and business address of each general partner of this partnership is:

Name Address
Endeka LLC 1111 W. Dekalb Pike
Wayne, PA 19087

2012 APR -3 PH 4: 08

PA DEPT OF STATE

APPENDIX 18

CURRENT OWNERSHIP TABLE OF ORGANIZATION

Redacted

APPENDIX 19

FUNCTIONAL TABLE OF ORGANIZATION FOR APPLICANT

Redacted

ENDEKA ENTERTAINMENT, LP
APPENDIX 20

APPENDIX 20

**COPIES OF 1120 FORMS, 941 FORMS AND ALL OTHER BUSINESS RELATED TAX
FORMS FILED WITH THE IRS IN THE LAST FIVE (5) YEARS**

Redacted

ENDEKA ENTERTAINMENT, LP
APPENDIX 21

APPENDIX 21-

COPIES OF 5500 FORMS FILED WITH THE IRS IN THE LAST FIVE (5) YEARS

Redacted

APPENDIX 22

DESCRIBE CRIMINAL HISTORY OF APPLICANT

Endeka Entertainment, LP is a newly formed entity and has no prior criminal history. By way of further response, please see the applications of each Principal of Endeka Entertainment, LP.

APPENDIX 23

REQUIREMENTS OF §1312 OF THE GAMING ACT

Does Not Apply

APPENDIX 24

**AN OWNERSHIP OR FINANCIAL INTEREST THAT IS GREATER THAN 33.3% OF
ANOTHER SLOT MACHINE LICENSEE**

Does Not Apply

APPENDIX 25

PUBLIC OFFICIAL OR OTHER PROHIBITED PERSON POSSESSED A FINANCIAL
INTEREST IN OR BEEN EMPLOYED DIRECTLY OR INDIRECTLY BY THE
APPLICANT OR RELATED ENTITY

Redacted

APPENDIX 26

EVIDENCE THAT THE APPLICANT HAS SUFFICIENT BUSINESS ABILITY
AND EXPERIENCE TO CREATE AND MAINTAIN A SUCCESSFUL, EFFICIENT
OPERATION

Redacted





January 24, 2013

ZZZ12-25838

Mr. James A. Doherty III, Esq.
Doherty Hayes LLC
1000 Bank Towers
Scranton, PA 18503

RE: Lawrence Downs – Mahoning, PA

Dear Mr. Doherty:

In response to the request, please be advised that there are no community type facilities such as churches, schools, playgrounds, community centers, hospitals, parks, charitable institutions, etc. within 1,500 feet of the proposed casino property boundary. Our position is based upon the attached exhibit showing the casino boundary and the adjacent 1,500 foot zone and local knowledge by individuals knowledgeable of the site and the existing conditions.

Please contact me should you have any questions:

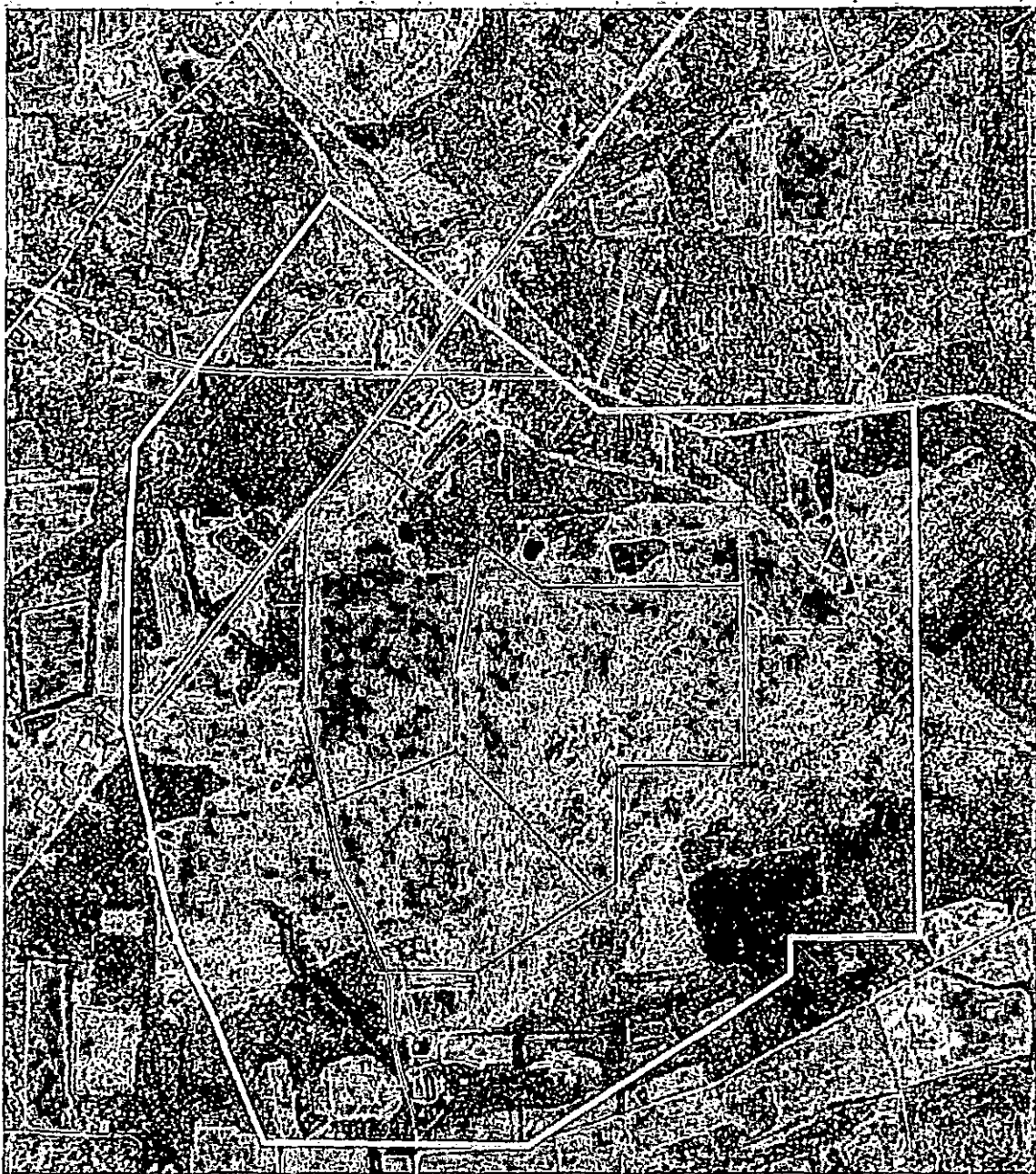
Sincerely,

PENNONI ASSOCIATES INC.

Daniel S. DiMucci, RLA, ASLA
Senior Vice President

cc: William Bryant
Ted Mondzelewski
Manny Stamatakis
Joseph Viscuso

x:\proposals\reg'on 1 philly metro-south jersey\west chester\1705\2012\12-25838 valley view downs\correspondence\sent\pro_doherty_lawrence downs_20130124.docx



APPENDIX 29

INITIAL NARRATIVE DESCRIPTION OF PROPOSED ADMINISTRATIVE AND
ACCOUNTING PROCEDURES PURSUANT TO §1322 OF THE GAMING ACT

Redacted

APPENDIX 30

MARKETING PLANS AND PROPOSALS AND DETAILS OF THE PROXIMITY OF
THE FACILITY TO ITS MARKETING SERVICE AREA

Redacted

APPENDIX 31

**LOCAL ZONING AND LAND USE APPROVALS OR A DETAILED EXPLANATION
OF THE STATUS OF THE REQUEST WITH COPIES OF ALL FILINGS**

Endeka Entertainment, LP is working closely with both the local and host municipalities to ensure that all necessary zoning and land use approvals are obtained in advance of any construction of the facility. To date, Endeka Entertainment, LP believes that it is in possession of all necessary approvals or that such approvals are in the process of being issued. Therefore, at this time, Endeka Entertainment, LP does not foresee any issues regarding obtaining the necessary zoning and/or land use approvals relative to the construction of its proposed facility in Lawrence County.

Prior to construction, Endeka Entertainment, LP will provide the commission with copies of all applicable permits and land use approvals necessary to satisfy any inquiries of the Commission. Since its creation in the Spring of 2012, Endeka Entertainment, LP has worked diligently to obtain the necessary approvals and permits for its site plan for both its track and gaming facilities. While this process continues to evolve to allow for the creation of the best possible facility to be created in Lawrence County, Endeka Entertainment, LP has continued to work closely with all regulatory and oversight organization to ensure that all the necessary applications, permits and regulatory approvals can be obtained for the project as presently designed. Endeka Entertainment, LP is confident that there will be no impediments to the implementation of its project as proposed, once approval is obtained from the Pennsylvania Harness Racing Commission.

Endeka Entertainment, LP plans to have all permits and approvals previously provided to its predecessors transferred in the immediate future.

Attached below is a list of all permits and approvals that will be transferred.

Exhibit "A": Table providing Permit Summary & Status dated December 4, 2012

Exhibit "B": Resolution No. 2012-12 of Mahoning Township transferring and assigning Land Development Plan Approvals and Zoning Approvals to Endeka Entertainment, LP

Valley View Downs Permit Status Table

of 12/4/2012

Name of Permit	Description	Expiration Date	Current Status of Renewal
Act 537 Plan Update	<i>Allows sewage from VVD to be treated</i>	<i>None</i>	<i>N/A</i>
PADEP Chapter 105 Permit for the site E37-105	Water obstruction and encroachment permit for wetlands	12/31/2013	Permit transferred from AHT to ENDEKA Renewal application due 7/1/2013
NPDES Permit / E&S Approval for the site PAG2-0037-08-003	Erosion and Sediment Control and Stormwater management during construction and post-construction	5/13/2013	Permit transferred from AHT to ENDEKA Renewal application submitted 11/14/2012
PADEP CAFO Permit for the site PAG128303	Operating permit for horse barns and adjacent concentrated animal feeding operations	5/12/2013	Permit transferred from AHT to ENDEKA New application will be submitted at least 180 days before commencing operations
General Permit (GP) Chapter 105 for Route 422 GP113708605	Allows widening US 422 across multiple unnamed tributaries of Shenango River	See footnote 1	Permit transfer ready to be signed by PADEP; no permit renewal required..
NPDES Permit Application for Route 422 PAG2-0037-08-005	Erosion and Sediment Control and Stormwater management during construction and post-construction	5/13/2013	Permit transferred from AHT to ENDEKA Renewal application submitted 11/14/2012

Footnote 1 - The GP11 is valid for 3 years or until the project specific permit (PAG2) expires, whichever occurs first. However, if construction has commenced (which it has), then the permit is valid until the construction is complete or the permit is suspended or revoked. Read the permit for the more detailed specific language.



**TOWNSHIP OF MAHONING
LAWRENCE COUNTY, PENNSYLVANIA**

RESOLUTION NO. 2012-12

**A RESOLUTION TRANSFERRING AND
ASSIGNING LAND DEVELOPMENT PLAN
APPROVALS AND ZONING VARIANCES TO
ENDEKA ENTERTAINMENT LP.**

WHEREAS, the Township of Mahoning has previously provided certain land development and zoning approvals for the purpose of the construction project known as "the Valley View Downs Racetrack and Casino", which shall be located in Mahoning Township, and;

WHEREAS, the board of supervisors wishes to transfer and assign the said approvals, to ENDEKA Entertainment LP for the purpose of constructing the Valley View Downs Racetrack and Casino;

NOW, THEREFORE, BE IT RESOLVED, by the Board of Supervisors of the Township of Mahoning, Lawrence County, Pennsylvania, as follows:

The following land development approvals and zoning variances that have previously been properly approved by Mahoning Township pursuant to the construction project known as the Valley View Downs Racetrack and Casino, are hereby transferred and assigned to ENDEKA Entertainment LP:

1. Height variance for construction of the porte cochere to approach the maximum allowable height (approved May 22, 2008);
2. Height variance for construction of a future hotel and parking structure (approved May 22, 2008);
3. Height variance for construction of facilities to accommodate future parking (approved May 22, 2008);
4. Variance for above-ground storage tank (approved May 22, 2008);
5. Variance for construction of overflow parking areas (approved May 22, 2008);
6. Approval of Land Development Plans for Valley View Downs Racetrack and Casino (approved and recommended to the board of supervisors by the Mahoning Township Planning Commission on March 26, 2008; approval affirmed by the board of supervisors at the regular meeting held on May 13, 2008).

The intent of this Resolution is to transfer all township approvals that are necessary for the Valley View Downs Racetrack and Casino project so that ENDEKA Entertainment, LP, may enjoy all the rights and privileges

associated therewith. The transfer shall be effective immediately as permitted by law, pending any necessary authorizations or approvals from county, state or federal governmental agencies or bodies.

ENACTED AND RESOLVED, this 13th day of November, 2012.

ATTEST:

MAHONING TOWNSHIP SUPERVISORS

Elaine M. Kielor
Secretary

Gary Pezzullo
Gary Pezzullo, Chairman

SEAL

Vito Yeropoli
Vito Yeropoli

Mark Sackin
Mark Sackin

APPENDIX 32

PROPOSED SITE PLAN, INCLUSIVE OF TRAFFIC STUDIES AND THE PARKING
PLAN AND THE GAMING FLOOR LAYOUT

Redacted

APPENDIX 33

PLANNED RETAIL AND FOOD VENUES FOR THE FACILITY, AND THE
IDENTIFICATION OF THE OPERATORS OF EACH RETAIL FOOD VENUE

Redacted

APPENDIX 34


**LOCAL IMPACT REPORT, ENGINEERING REPORTS AND TRAFFIC STUDIES,
INCLUDING DETAILS OF ANY ADVERSE IMPACT ON TRANSPORTATION,
TRANSIT ACCESS, HOUSING, WATER AND SEWER SYSTEMS,
LOCAL POLICE AND EMERGENCY SERVICE CAPABILITIES,
EXISTING TOURISM, INCLUDING HISTORICAL AND CULTURAL
RESOURCES OR OTHER MUNICIPAL SERVICE OR RESOURCE**

The following documents are responsive to the inquiry set forth at Appendix 43:

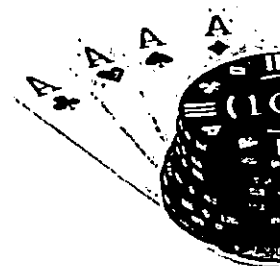

Exhibit "A" – "Economic and Fiscal Impacts of the Proposed Lawrence Downs Casino and Racing Resort" prepared by Econsult Solutions.

Exhibit "B" – "Employment Impacts of the Proposed Lawrence Downs Casino and Racing Resort" prepared by Econsult Solutions.

Exhibit "C" - "Traffic Impact Assessment" prepared by Pennoni Associates, Inc.



ECONOMIC AND FISCAL IMPACTS OF THE PROPOSED LAWRENCE DOWNS CASINO AND RACING RESORT



MAY 29, 2013

FINAL REPORT SUBMITTED TO:

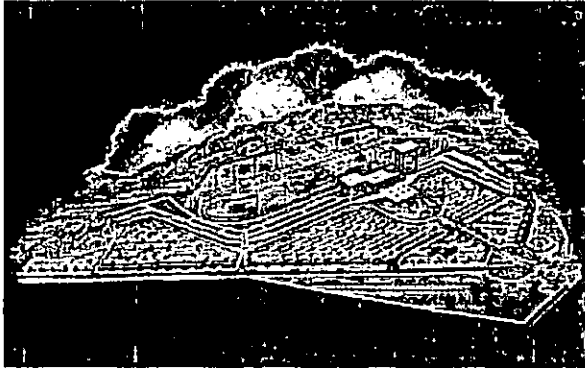
Doherty Hayes, LLC
1000 Bank Towers
321 Spruce Street
Scranton, PA 18503

FINAL REPORT SUBMITTED BY:

Econsult Solutions
1435 Walnut Street
Philadelphia, PA 19102

Econsult Solutions | 1435 Walnut Street, Ste. 300 | Philadelphia, PA 19102
215-717-2777 | econsultsolutions.com

 **ECONSULT
SOLUTIONS**
economics | policy | strategy



Executive Summary	ii
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2.0 Economic and Fiscal Impact Methodology	2
3.0 Economic and Fiscal Impact of Upfront Construction of Lawrence Downs	3
4.0 Economic and Fiscal Impact of Ongoing Operations of Lawrence Downs	9
5.0 Economic and Fiscal Impact of Visitor Spending Attracted by Lawrence Downs	14
Appendix A – Economic and Fiscal Impact Methodology	A-1

EXECUTIVE SUMMARY

Endeka Entertainment is proposing to construct a standardbred racetrack and casino in Lawrence County in the Commonwealth of Pennsylvania. This development would offer a premier gambling space with 1,250 slots, 41 table games, and 10 poker games, in addition to a harness track for horse racing. The facility, Lawrence Downs, would also offer between 220 and 240 restaurant seats for fine dining, and live music.

The purpose of this report is to quantify the economic and fiscal impacts associated with the construction and operation of the racetrack and casino, as well as with the visitor spending it will draw (see Table ES.1 and Table ES.2). For the purposes of this report, economic impacts are sized to the Commonwealth level and to a subset that consists of Allegheny, Beaver, Butler, Mercer, and Lawrence counties.

Table ES.1 – One-Time Economic Impact of Upfront Construction of Lawrence Downs on the Five-County Region and the Commonwealth of Pennsylvania

Upfront Construction	Within the Region	Within the Commonwealth
Total Expenditures (\$M)	\$188.6	\$220.8
Total Employment (Jobs)	1,356	1,686
Total Tax Revenues (\$M)		\$5.3

Table ES.2 – Annual Economic Impact of Year 5 Ongoing Operations of Lawrence Downs and Visitor Spending Attracted by Lawrence Downs on the Five-County Region and the Commonwealth of Pennsylvania

Ongoing Operations	Within the Region	Within the Commonwealth
Total Expenditures (\$M)	\$66.9	\$74.7
Total Employment (Jobs)	650	725
Total Tax Revenues (\$M)		\$1.9
Visitor Spending	Within the Region	Within the Commonwealth
Total Expenditures (\$M)	\$113.7	\$131.4
Total Employment (Jobs)	1,507	1,706
Total Tax Revenues (\$M)		\$3.2

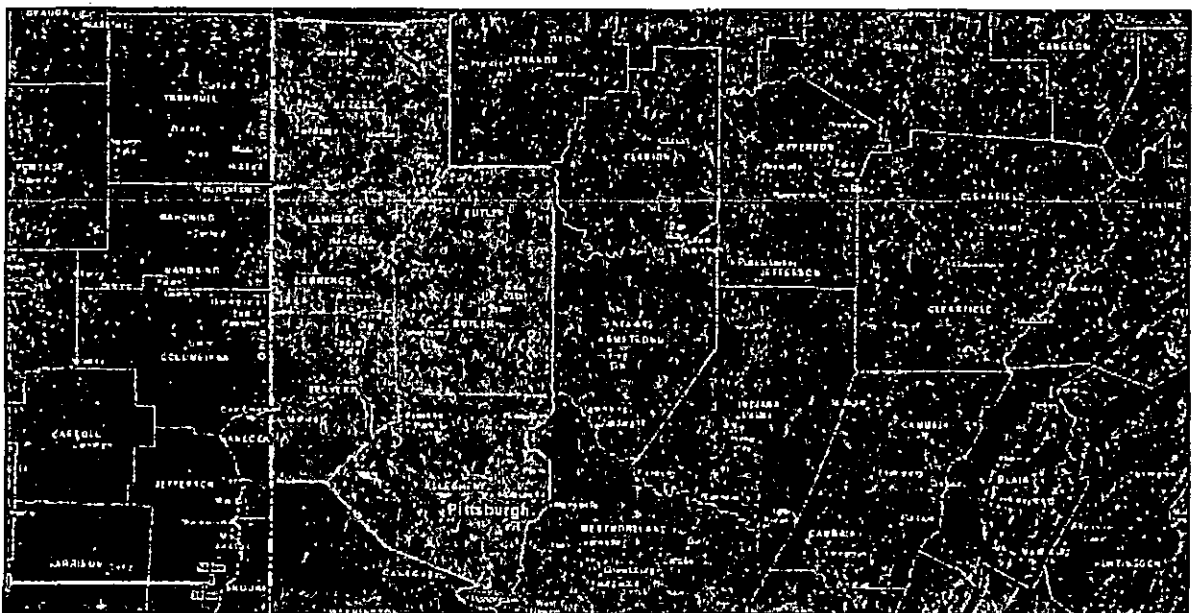
1.0 INTRODUCTION

Endeka Entertainment is proposing to construct a standardbred racetrack and casino in Lawrence County in the Commonwealth of Pennsylvania. This development, when completed, would offer a premier gambling space with 1,250 slots, 41 table games, and 10 poker games, in addition to a harness track for horse racing. The facility, Lawrence Downs, would also offer between 220 and 240 restaurant seats for fine dining, and live music.

The location is within close proximity of both the Greater Pittsburgh area and Youngstown, Ohio. As such, it is likely to attract visitors from across state lines, resulting in an importation of purchasing power into the Commonwealth for the benefit of Commonwealth employment and Commonwealth tax revenues.

The purpose of this report is to identify and quantify the many economic impacts associated with the construction and operation of the racetrack and casino, as well as with the visitor spending it will draw. For the purposes of this report, economic impacts are sized to the Commonwealth-wide level as well as to a subset of the Commonwealth that consists of Allegheny, Beaver, Butler, Mercer, and Lawrence counties (hereafter referred to as "the Region") (see Figure 1.1).

Figure 1.1 – Estimated Impact Region for Lawrence Downs



Source: ESRI (2013), Econsult Solutions, Inc. (2013)

2.0 ECONOMIC AND FISCAL IMPACT METHODOLOGY

2.1 Economic Impact Methodology

Economic activity generated by Lawrence Downs, in the form of upfront construction, ongoing expenditures, and visitor spending, produces two kinds of spillover effects. First, locally sourced materials generate increased business activity for local vendors, who in turn ramp up their activities and their own sourcing; this is known as the indirect effect. Second, workers earn wages and in turn spend a portion of their earnings within their local economies; this is known as the induced effect. The composition and scale of these spillover effects can be modeled using Regional Input-Output Modeling System (RIMS II) multiplier data provided by the US Department of Commerce Bureau of Economic Analysis.¹

In this way, one can model the total economic impact generated by Lawrence Downs. As noted above, this impact will be sized to the Region and Commonwealth levels. In other words, direct expenditures generate economic activity that ripples out from Lawrence Downs to touch the entire Region and Commonwealth. Since the Region is completely contained within the Commonwealth, the Commonwealth economic impact figures include the Region economic impact figures, and the difference between the two represents the amount of economic activity that takes place in the parts of the Commonwealth outside Region.²

2.2 Fiscal Impact Methodology

The sum of the direct expenditures associated with Lawrence Downs and the spillover impacts that result from them in turn lead to various temporary and permanent expansions in various Commonwealth tax bases and therefore generate one-time and ongoing increases in Commonwealth tax revenues. These tax revenue increases can be modeled by looking at the extent to which various economic impacts increase various parts of the Commonwealth economy.³

¹ The most recent RIMS II multipliers for the Region and the Commonwealth are from 2010. Therefore, all input expenditures are deflated to 2010 terms, so that they are expressed in the same terms as the multipliers. See Appendix A for additional detail on input-output modeling.

² See Appendix A.3 for additional detail on Econsult Solutions' economic impact methodology.

³ See Appendix A.4 for additional detail on Econsult Solutions' fiscal impact methodology.

3.0 ECONOMIC AND FISCAL IMPACTS OF UPFRONT CONSTRUCTION OF LAWRENCE DOWNS

3.1 Overview

The first way in which Lawrence Downs will generate impacts within the Region and Commonwealth is through upfront construction. During the construction phase itself, Lawrence Downs will represent many temporary employment opportunities and a significant amount of new demand for vendors within the Region and Commonwealth. This in turn generates spillover effects throughout the Region and Commonwealth, supporting additional spending and employment.

3.2 Direct Expenditures from Upfront Construction

Total project costs for the casino and racetrack are anticipated to be about \$233 million, based on figures provided by Endeika Entertainment. Of this amount, about \$101 million is considered modelable in terms of its direct impact on the Region and Commonwealth (see Table 3.1). Other expenditures are partially or fully excluded because they do not necessarily represent direct and immediate outlays within the Region and Commonwealth and therefore are not likely to have nearly as much impact within the Region and Commonwealth:

1. Land, financing, and contingencies are typically excluded from input-output analyses.
2. Slot machines and FFE typically involve out-of-state vendors, although a portion of these expenditures are in-state, representing the wholesaling, transportation, and installation of these items.
3. Cage cash and licensing fees do not represent construction expenditures.

**Table 3.1 – Summary of Modelable and Unmodelable Expenditures
Associated with Upfront Construction of Lawrence Downs (in \$M)**

Cost Category	Modelable	Unmodelable	Total
Construction	\$73.2	\$6.8	\$80.0
Design and Permit Fees	\$6.0	\$0.0	\$6.0
Testing, Utility Consumption	\$1.0	\$0.0	\$1.0
Signage	\$1.0	\$0.0	\$1.0
Finance Costs	\$0.0	\$12.0	\$12.0
Slots, Including Install	\$10.7	\$13.3	\$24.0
FFE	\$3.9	\$17.1	\$21.0
Pre-Opening Expense	\$5.0	\$0.0	\$5.0
Cage Cash	\$0.0	\$7.0	\$7.0
Licensing	\$0.0	\$68.0	\$68.0
Land	\$0.0	\$7.5	\$7.5
Total	\$100.8	\$131.8	\$232.5

Source: Endeka Entertainment (2013), Econsult Solutions, Inc. (2013)

Next, it is necessary to translate these costs with the year associated with the most recently available RIMS II multipliers (2010). Using the gross domestic product deflator provided by the St. Louis Federal Reserve, the modelable costs were deflated into 2010 dollars, resulting in direct modelable construction expenditures of \$97 million (see Table 3.2).

Table 3.2 – Modelable Expenditures Associated with Upfront Construction of Lawrence Downs (in 2010 \$M)

Cost Category	Modelable Cost	Modelable Cost (in 2010 terms)
Construction	\$73.2	\$70.1
Design and Permit Fees	\$6.0	\$5.7
Testing, Utility Consumption	\$1.0	\$1.0
Signage	\$1.0	\$1.0
Finance Costs	\$0.0	\$0.0
Slots, Including Install	\$10.7	\$10.2
FFE	\$3.9	\$3.7
Pre-Opening Expense	\$5.0	\$4.8
Cage Cash	\$0.0	\$0.0
Licensing	\$0.0	\$0.0
Land	\$0.0	\$0.0
Total	\$100.8	\$96.6

Source: Endeka Entertainment (2013), Econsult Solutions, Inc. (2013)

3.3 Economic Impact from Upfront Construction

The \$97 million in direct expenditures associated with upfront construction of Lawrence Downs will have a significant impact on the Region and Commonwealth economy (see Table 3.3). Within the Region, there will be a one-time impact of about \$190 million, supporting about 1,400 jobs and about \$60 million in earnings. Within the Commonwealth, there will be a one-time impact of about \$220 million, supporting about 1,700 jobs and about \$70 million in earnings.

Table 3.3 – One-Time Economic Impact of Upfront Construction of Lawrence Downs on the Five-County Region and the Commonwealth of Pennsylvania

Upfront Construction	Within the Region	Within the Commonwealth
Direct Expenditures (\$M)	\$96.6	\$96.6
Indirect & Induced Expenditures (\$M)	\$92.0	\$124.2
Total Expenditures (\$M)	\$188.6	\$220.8
Total Employment (Jobs)	1,356	1,686
Total Earnings (\$M)	\$57	\$72

Source: Endeka Entertainment (2013), US Department of Commerce (2011), Econsult Solutions, Inc. (2013)

3.4 Industry Distribution of Economic Impact from Upfront Construction

While the construction industry will benefit the most from upfront construction of Lawrence Downs, other industries will gain as well (see Table 3.4). It is estimated that within the Region, about 62 percent of the one-time expenditure impact and about 63 percent of the temporary employment impact will be in industries besides construction, and that within the Commonwealth, about 67 percent of the one-time expenditure impact and about 65 percent of the temporary employment impact will be in industries besides construction.

Table 3.4 – Industry Distribution of Economic Impact of Upfront Construction of Lawrence Downs on the Five-County Region and the Commonwealth of Pennsylvania

Expenditure Impact within the Region	%	Expenditure Impact within the Commonwealth	%
Construction	38.1%	Construction	32.6%
Professional, scientific, and technical services	11.1%	Manufacturing	13.0%
Manufacturing	8.2%	Professional, scientific, and technical services	10.2%
Real estate and rental and leasing	6.2%	Real estate and rental and leasing	6.1%
Wholesale trade	5.3%	Wholesale trade	5.7%
All other industries	31.0%	All other industries	32.4%
Employment Impact within the Region	%	Employment Impact within Commonwealth	%
Construction	37.0%	Construction	34.6%
Professional, scientific, and technical services	10.4%	Professional, scientific, and technical services	9.2%
Retail trade	8.0%	Retail trade	8.1%
Arts, entertainment, and recreation	7.2%	Manufacturing	6.5%
Health care and social assistance	5.9%	Health care and social assistance	6.3%
All other industries	31.5%	All other industries	35.3%

Source: Endeika Entertainment (2013), US Department of Commerce (2011), Econsult Solutions, Inc. (2013)

3.5 Fiscal Impact from Upfront Construction

In addition to the economic impacts from upfront construction, the Commonwealth is also expected to gain sizeable tax revenues from construction activity. The Commonwealth will generate about \$5 million in tax revenues from upfront construction (see Table 3.4).

Table 3.5 – One-Time Fiscal Impact of Upfront Construction of Lawrence Downs on the Commonwealth of Pennsylvania

Construction	Commonwealth of Pennsylvania
Income Tax Revenues (\$M)	\$1.31
Sales Tax Revenues (\$M)	\$3.59
Business Tax Revenues (\$M)	\$0.42
Total Tax Revenues (\$M)	\$5.32

Source: Endeika Entertainment (2013); US Department of Commerce (2011), Econsult Solutions, Inc. (2013)

4.0 ECONOMIC AND FISCAL IMPACTS OF ONGOING OPERATIONS OF LAWRENCE DOWNS

4.1 Overview

The second way in which Lawrence Downs will generate impacts within the Region and Commonwealth is through ongoing operations. Once construction has been completed, Lawrence Downs will represent many permanent employment opportunities and a significant amount of new ongoing demand for vendors within the Region and Commonwealth. This in turn generates spillover effects throughout the Region and Commonwealth, supporting additional spending and employment.

4.2 Direct Expenditures from Year 5 Ongoing Operations

To properly account for what an average year would be for Lawrence Downs' operations, figures projected by Endeka Entertainment for the fifth year of operations were assumed to represent steady state operations levels. This is because within the five-year ramp up period, Lawrence Downs projects to increase its market penetration by nine percent and gaming revenues by thirty percent, whereas after this five year period, gaming revenues and market penetration increase at an organic rate of inflation.

As with the approach with upfront construction expenditures, two adjustments must be made to projected expenditures:

1. First, a distinction must be made between modelable and unmodelable expenditures, with the latter being excluded from input-output analysis because they do not necessarily represent local expenditures that have a multiplier effect within the Region and Commonwealth. In this case, a significant portion of operating expenditures is accounted for in gaming taxes paid, for which it cannot be assumed those funds are necessarily used immediately within the Region and Commonwealth with an attendant benefit to the Region and Commonwealth economy.
2. Second, the modelable expenditure numbers must be adjusted to 2010 terms so that it is expressed in the same terms as the multipliers used to estimate total economic impact.

This two-step approach yields an estimated annual operating expenditure amount of about \$45 million (see Table 4.1).

Table 4.1 – Summary of Modelable and Unmodelable Expenditures Associated with Year 5 Ongoing Operations of Lawrence Downs (in \$M)

Expenditure Category	Total	Modelable	
		Modelable	(2010\$)
Gaming Taxes	\$71.0	\$0.0	\$0.0
Cost of Goods Sold	\$4.2	\$4.2	\$4.0
Labor	\$19.3	\$19.3	\$18.4
Marketing	\$2.8	\$2.8	\$2.7
Other Expense	\$11.9	\$11.9	\$11.4
Management Fee	\$3.0	\$0.0	\$0.0
Other Fees	\$0.7	\$0.0	\$0.0
Rent	\$10.0	\$10.0	\$9.6
Depreciation	\$7.8	\$0.0	\$0.0
Interest Expense	\$3.9	\$0.0	\$0.0
State Taxes	\$0.3	\$0.0	\$0.0
Federal Taxes	\$1.0	\$0.0	\$0.0
Total	\$135.8	\$48.2	\$46.1

Source: Endeika Entertainment (2013), US Department of Commerce (2011), Econsult Solutions, Inc. (2013)

4.3 Economic Impact from Year 5 Ongoing Operations

The \$46 million in direct expenditures associated with ongoing operations of Lawrence Downs will have a significant impact on the Region and Commonwealth economy (see Table 4.2). Within the Region, there will be an annual impact of about \$68 million, supporting about 660 jobs and about \$1.7 million in earnings. Within the Commonwealth, there will be an annual impact of about \$7.7 million, supporting about 730 jobs and about \$20 million in earnings.

Table 4.2 – Annual Economic Impact of Year 5 Ongoing Operations of Lawrence Downs on the Five-County Region and the Commonwealth of Pennsylvania

Ongoing Operations	Within the Region	Within the Commonwealth
Direct Expenditures (\$M)	\$46.1	\$46.1
Indirect & Induced Expenditures (\$M)	\$22.2	\$30.4
Total Expenditures (\$M)	\$68.3	\$76.5
Total Employment (Jobs)	660	733
Total Earnings (\$M)	\$17	\$20

Source: Endeka Entertainment (2013), US Department of Commerce (2011), Econsult Solutions, Inc. (2013)

4.4 Industry Distribution of Economic Impact from Year 5 Ongoing Operations

While the entertainment industry will benefit the most from ongoing operations of Lawrence Downs, other industries will gain as well (see Table 4.3). It is estimated that within the Region, about 75 percent of the annual expenditure impact and about 45 percent of the permanent employment impact will be in industries besides entertainment, and that within the Commonwealth, about 78 percent of the annual expenditure impact and about 59 percent of the permanent employment impact will be in industries besides entertainment.

Table 4.3 – Industry Distribution of Economic Impact of Year 5 Ongoing Operations of Lawrence Downs on the Five-County Region and the Commonwealth of Pennsylvania

Expenditure Impact within the Region		Expenditure Impact within the Commonwealth	
	%		%
Arts, entertainment, and recreation	24.2%	Arts, entertainment, and recreation	21.7%
Real estate and rental and leasing	23.3%	Real estate and rental and leasing	20.8%
Finance and insurance	8.9%	Finance and insurance	8.9%
Professional, scientific, and technical services	7.8%	Professional, scientific, and technical services	7.7%
Health care and social assistance	7.5%	Manufacturing	7.6%
All other industries	28.3%	All other industries	33.3%
Employment Impact within the Region		Employment Impact within the Commonwealth	
	%		%
Arts, entertainment, and recreation	55.0%	Arts, entertainment, and recreation	40.4%
Real estate and rental and leasing	19.1%	Real estate and rental and leasing	12.4%
Health care and social assistance	9.7%	Health care and social assistance	7.8%
Retail trade	9.1%	Retail trade	7.4%
Professional, scientific, and technical services	5.5%	Professional, scientific, and technical services	5.4%
All other industries	22.5%	All other industries	26.6%

Source: Endeika Entertainment (2013), US Department of Commerce (2011), Econsult Solutions, Inc. (2013)

4.5 Fiscal Impact from Year 5 Ongoing Operations

In addition to the economic impacts from ongoing operations, the Commonwealth is also expected to gain sizeable tax revenues from operating activity. The Commonwealth will generate about \$2 million per year in tax revenues from ongoing operations (see Table 4.4). This comes from expansions in various Commonwealth tax bases from the economic activity generated by ongoing operations, and is in addition to the \$71 million in direct gaming tax revenues that will be paid mostly to the Commonwealth as well as to various localities.

Table 4.4 – Annual Fiscal Impact of Year 5 Ongoing Operations of Lawrence Downs on the Commonwealth of Pennsylvania

Construction	Commonwealth of Pennsylvania
Income Tax Revenues (\$M)	\$0.37
Sales Tax Revenues (\$M)	\$1.37
Business Tax Revenues (\$M)	\$0.16
Total Tax Revenues (\$M)	\$1.90

Source: Endeka Entertainment (2013), US Department of Commerce (2011), Econsult Solutions, Inc. (2013)

5.0 ECONOMIC AND FISCAL IMPACTS OF VISITOR SPENDING ATTRACTED BY LAWRENCE DOWNS

5.1 Overview

A third and important way in which Lawrence Downs will generate impacts within the Region and Commonwealth is by attracting visitors to the Region and Commonwealth. In other words, Lawrence Downs will represent the importation of many visitors into the Region and Commonwealth, whose spending supports employment and generates tax revenue within the Region and Commonwealth.

5.2 Direct Expenditures from Visitor Spending

This category of direct expenditures associated with spending by visitors is by far the most difficult one to estimate, because of the many relative unknowns: how many people will visit the proposed development, where will they come from, and what will they spend their money on. This analysis was informed by numbers provided by Endeka Entertainment and by consultants engaged by Endeka Entertainment in analyzing market demand and visitor composition, as well as by independent research and analysis.

Three data points from a November 2009 report by the Innovation Group were used as a starting point. First is the number and geographic distribution of visitors to Lawrence Downs, as determined by capture rates from other nearby destinations. Based on that analysis, it is estimated that the proposed development will see about 2.91 million visitors per year, of which about 2.0 million will be coming from outside the Commonwealth (see Table 5.1).

Table 5.1 – Estimated Annual Visitors to Lawrence Downs, as Captured from Other Nearby Destinations

Market Segment	Market Visits	Capture Rate	# Captured	# New to PA
Akron	1,351,626	12.0%	162,195	162,195
Cleveland	4,606,648	5.3%	244,152	244,152
NE Ohio	952,855	20.2%	192,477	192,477
Pittsburgh	7,981,994	4.0%	319,280	0
Pittsburgh Sec East	623,146	6.8%	42,374	0
Presque Isle	1,197,576	0.5%	5,988	0
Presque Isle Sec	184,241	9.7%	17,871	0
Presque Isle Ter	136,486	9.1%	12,420	0
Primary	2,316,926	78.9%	1,828,055	1,279,638
Salamanca	249,854	1.8%	4,497	4,497
Tertiary South	299,610	2.2%	6,591	6,591
Tertiary SW	513,346	1.2%	6,160	6,160
WV Casinos-Primary	1,006,588	2.2%	22,145	22,145
WV Casinos Sec South	153,105	2.1%	3,215	3,215
WV Casinos Sec West	417,385	10.8%	45,078	45,078
Total	21,991,386	13.2%	2,912,499	1,966,149

Source: Endeka Entertainment (2013), Innovation Group (2009), Econsult Solutions, Inc. (2013)

Second is the number of current hotel guests near Lawrence Downs that will choose to visit once it has opened. It is estimated that this will add an additional 62,000 visitors (see Table 5.2).

Table 5.2 – Estimated Annual Visitors to Lawrence Downs, as Captured from Nearby Hotels

Nearby Hotel Rooms	Occupancy Rate	Annual # Rooms	Capture Rate	# Visits
4,420	70%	1,129,310	5.50%	62,112

Source: Endeka Entertainment (2013), Innovation Group (2009), Econsult Solutions, Inc. (2013)

Third is the number of drivers passing by Lawrence Downs that will choose to visit once it has opened. It is estimated that this will add an additional 82,000 visitors (see Table 5.3).

Table 5.3 – Estimated Annual Visitors to Lawrence Downs, as Captured from Highway Traffic

Highway	Avg Daily Traffic	Passthru %	Adults /Vehicle	Capture Rate	# Visits	# New to PA
Hwy 422	5,731	35%	1.5	1.7%	18,669	0
Hwy 60	15,920	25%	1.5	1.7%	37,044	37,044
Hwy 80	30,780	30%	1.5	0.9%	45,501	45,501
I 76	23,350	30%	1.5	0.6%	23,011	0
Total	75,781				124,225	82,544

Source: Endeka Entertainment (2013), Innovation Group (2009), Econsult Solutions, Inc. (2013)

These visitors are sorted into spending profile categories – in town, out of town day trip, and out of town overnight (see Table 5.4) – and each spending profile category is given an estimated per-person spending amount (see Table 5.5). Multiplying through yields an estimated \$104 million per year in spending generated by visitors of the proposed development, of which about \$64 million is considered new to the Commonwealth (see Table 5.6). Note that this spending does not include that which takes place at Lawrence Downs since those dollars are already accounted for in the ongoing operations figures from the previous section, but are rather additional dollars spent outside of Lawrence Downs at other locations.

Table 5.4 – Estimated Distribution of Annual Visitors to Lawrence Downs, by Spending Profile Category

Market Segment	In-Town – Not New to PA	In-Town – New to PA	Out of Town – Day Trip	Out of Town – Overnight
Akron			162,195	
Cleveland			244,152	
NE Ohio		192,477		
Pittsburgh	319,280			
Pittsburgh Sec East	42,374			
Presque Isle	5,988			
Presque Isle Sec	17,871			
Presque Isle Ter	12,420			
Primary	914,028	914,028		
Salamanca				4,497
Tertiary South				6,591
Tertiary SW				6,160
WV Casinos- Primary		22,145		
WV Casinos Sec South			3,215	
WV Casinos Sec West			45,078	
Total	1,311,961	1,128,650	454,640	17,248

Source: Endeka Entertainment (2013), Innovation Group (2009), Econsult Solutions, Inc. (2013)

Table 5.5 – Estimated Spending Profile Details for Annual Visitors to Lawrence Downs, by Spending Profile Category

Expenditure Category	In-Town – Not New to PA	In-Town – New to PA	Out of Town – Day Trip	Out of Town – Overnight
Transportation	\$10	\$10	\$20	\$40
Accommodations				\$80
Food/Retail/Entertainment	\$20	\$20	\$40	\$60
Total	\$30	\$30	\$60	\$180

Source: US Bureau of Labor Statistics (2009), US General Service Administration (2009), Econsult Solutions, Inc. (2013)

Table 5.6 – Estimated Annual Visitor Spending Generated by Lawrence Downs

	In-Town – Not New to PA	In-Town – New to PA	Out of Town – Day Trip	Out of Town – Overnight	Total
Estimated # Visitors (\$M)	1.31	1.13	0.45	0.02	2.91
Estimated Spending/Visitor	\$30	\$30	\$60	\$180	
Total Spending (\$M)	\$39.4	\$33.9	\$27.3	\$3.1	\$103.6
Total Spending New to PA (\$M)		\$33.9	\$27.3	\$3.1	\$64.2
Total Spending New to PA (2010\$)		\$33.1	\$26.6	\$3.0	\$62.7

Source: Endeika Entertainment (2013), Innovation Group (2009), US Bureau of Labor Statistics (2009), US General Service Administration (2009), Econsult Solutions, Inc. (2013)

5.3 Economic Impact from Visitor Spending

The \$63 million in direct expenditures associated with visitor spending attracted by Lawrence Downs will have a significant impact on the Region and Commonwealth economy (see Table 5.7). Within the Region, there will be an annual impact of about \$114 million, supporting about 1,500 jobs and about \$34 million in earnings. Within the

Commonwealth, there will be an annual impact of about \$131 million, supporting about 1,700 jobs and about \$41 million in earnings.

Table 5.7 – Annual Economic Impact of Visitor Spending Attracted by Lawrence Downs on the Five-County Region and the Commonwealth of Pennsylvania

Visitor Spending	Within the Region	Within the Commonwealth
Direct Expenditures (\$M)	\$62.7	\$62.7
Indirect & Induced Expenditures (\$M)	\$51.0	\$68.6
Total Expenditures (\$M)	\$113.7	\$131.4
Total Employment (Jobs)	1,507	1,706
Total Earnings (\$M)	\$34	\$41

Source: Endeika Entertainment (2013), US Department of Commerce (2011), Econsult Solutions, Inc. (2013)

5.4 Industry Distribution of Economic Impact from Visitor Spending

While the food and drink industry will benefit the most from ongoing operations of Lawrence Downs, other industries will gain as well (see Table 5.8). It is estimated that within the Region, about 62 percent of the annual expenditure impact and about 42 percent of the permanent employment impact will be in industries besides food and drink, and that within the Commonwealth, about 67 percent of the annual expenditure impact and about 52 percent of the permanent employment impact will be in industries besides food and drink.

Table 5.8 – Industry Distribution of Economic Impact of Visitor Spending Attracted by Lawrence Downs on the Five-County Region and the Commonwealth of Pennsylvania

Expenditure Impact within the Region		Expenditure Impact within the Commonwealth	
	%		%
Food services and drinking places	37.5%	Food services and drinking places	32.5%
Transportation and warehousing	19.8%	Transportation and warehousing	17.6%
Real estate and rental and leasing	6.6%	Manufacturing	11.0%
Manufacturing	5.6%	Real estate and rental and leasing	6.2%
Finance and insurance	4.8%	Finance and insurance	5.1%
All other industries	25.7%	All other industries	27.6%
Employment Impact within the Region		Employment Impact within the Commonwealth	
	%		%
Food services and drinking places	58.2%	Food services and drinking places	47.9%
Transportation and warehousing	31.3%	Transportation and warehousing	26.1%
Retail trade	3.7%	Retail trade	3.7%
Health care and social assistance	3.6%	Health care and social assistance	3.5%
Real estate and rental and leasing	3.2%	Manufacturing	2.9%
All other industries	12.7%	All other industries	15.8%

Source: Endeka Entertainment (2013), US Department of Commerce (2011), Econsult Solutions, Inc. (2013)

5.5 Fiscal Impact from Visitor Spending

In addition to the economic impacts from visitor spending, the Commonwealth is also expected to gain sizeable tax revenues. The Commonwealth will generate about \$3 million per year in tax revenues from ongoing operations (see Table 5.9).

Table 5.9 – Annual Fiscal Impact of Visitor Spending Attracted by Lawrence Downs on the Commonwealth of Pennsylvania

Construction	Commonwealth of Pennsylvania
Income Tax Revenues (\$M)	\$0.74
Sales Tax Revenues (\$M)	\$2.20
Business Tax Revenues (\$M)	\$0.26
Total Tax Revenues (\$M)	\$3.20

Source: Endeka Entertainment (2013), US Department of Commerce (2011), Econsult Solutions, Inc. (2013)

APPENDIX A – ECONOMIC AND FISCAL IMPACT METHODOLOGY

A.1 History

The theory behind input-output modeling stretches as far back as the mid 17th century, when Sir William Petty described the interconnectedness of “production, distribution, and wealth disposal.” While Petty can be credited with noticing links between economies, input-output modeling did not begin to take true form until the mid 18th century, when French physician François Quesnay created the *Tableau Économique*. His work detailed how a landowner spends his earnings on goods from farmers and merchants, who in turn spend their money on a host of goods and services. Over the course of the century, an algebraic framework was added by Achille-Nicholas Isnard. Robert Torrens and Léon Walras refined the model by establishing the connections between profits and production.

The modern input-output system can be attributed to Wassily Leontief. In his thesis, “The Economy as a Circular Flow” (1928), he outlined the economy as an integrated system of linear equations relating inputs and outputs. This framework soon gained popularity, and became a widely accepted analytical tool. In 1936, Leontief produced the first input-output analysis of the US. Leontief’s work became the US Department of Commerce’s Bureau of Economic Analysis’s (BEA) standard benchmark for US production in the 1950’s. Leontief received a Nobel Prize for his work in 1973.

By the 1970’s, the BEA had developed regional multipliers that could benchmark regional production throughout the US. Through extensive surveying, the impacts of each industry could be determined at the individual county level. These multipliers later became known as the Regional Input-Output Modeling System, RIMS. These multipliers would later be improved in the 1980’s and reclassified as RIMS II multipliers. This new system soon became a trusted standard in economic impact studies. The updated RIMS II multipliers show the effect on the local economy that localized expenditures have in terms of employment, output, and earnings.

A.2 Application

The use and application of multipliers are fairly basic and intuitive. Multipliers, in their most basic form, are the result of an algebraic analysis expressing how two inputs are interconnected in the production of an output. The result of the equation generates a multiplier that is broken down into direct, indirect, and induced effects. In a generalized example: if the multiplier for good “X” to good “Y” is 3, then the direct of good “X” on “Y” is 1, with indirect and induced effects of 2. Essentially, every unit of good “X” supports 2 units of good “Y”.

When implemented on a large complex scale, such as that of the US economy or any subsection of it, multiplier effects across industries can be complicated. However, the same general concept comes into play. Each industry has largely different and varied inputs into other industries. The quantity of the output is largely decided by the scale and efficiency of the industries involved. As a result, the sum of those inputs equates to an output product plus a value added/component. By arranging these inputs and outputs by industry in a matrix, and performing some algebra to find the Leontief inverse matrix, each industry's effect on final demand can be estimated. Additionally, the direct, indirect, and induced effects can also be determined. Direct effects include direct purchases for production, indirect effects include expenses during production, and induced effects concern the expenditures of employees directly involved with production. Using building construction as an example, the direct effects would include materials, brick, steel, and mortar, the indirect effects would involve the steel fabrication, concrete mixing, and the induced effects would consider the construction workers purchases from their wages. While impacts vary in size, each industry has rippling effects throughout the economy. By using an input-output model, these effects can be more accurately quantified and explained.

RIMS II is one of several popular choices for regional input-output modeling. Each system has its own nuances in establishing proper location coefficients. RIMS II uses a location quotient to determine its regional purchase coefficient (RPC). This represents the proportion of demand for a good that is filled locally; this assessment helps determine the multiplier for the localized region. RIMS II takes the multipliers and divides them into over 500 industry categories in accordance to the North American Industrial Classification System (NAICS) codes. A comprehensive breakdown of a region's multipliers by industry can be shown.

Despite the usefulness of input-output modeling, there are some shortcomings to the system. Notably, input-output models ignore economies of scale. Input-output models assume that costs and inputs remain proportionate through different levels of production. Further, multipliers are not generally updated on a timely basis; most multipliers are prone to be outdated with the current economy. If the multipliers are sourced from a year of a recession economy, the multipliers may not accurately represent the flows from an economic boom period. Additionally, the multipliers may not capture sudden legal or technological changes which may improve or decrease efficiency in the production process. Regardless, I-O models still serve as the standard in the estimation of local and regional impacts.

A.3 Economic Impact Model

The methodology and input-output model used in this economic impact analysis are considered standard for estimating such expenditure impacts, and the results are typically recognized as reasonable and plausible effects, based on the assumptions (including data) used to generate the impacts. In general, one can say that any economic activity can be described in terms of the total output generated from every dollar of direct expenditures. If an industry in a given region sells \$1 million of its goods, there is a direct infusion of \$1 million into the region. These are referred to as direct expenditures.

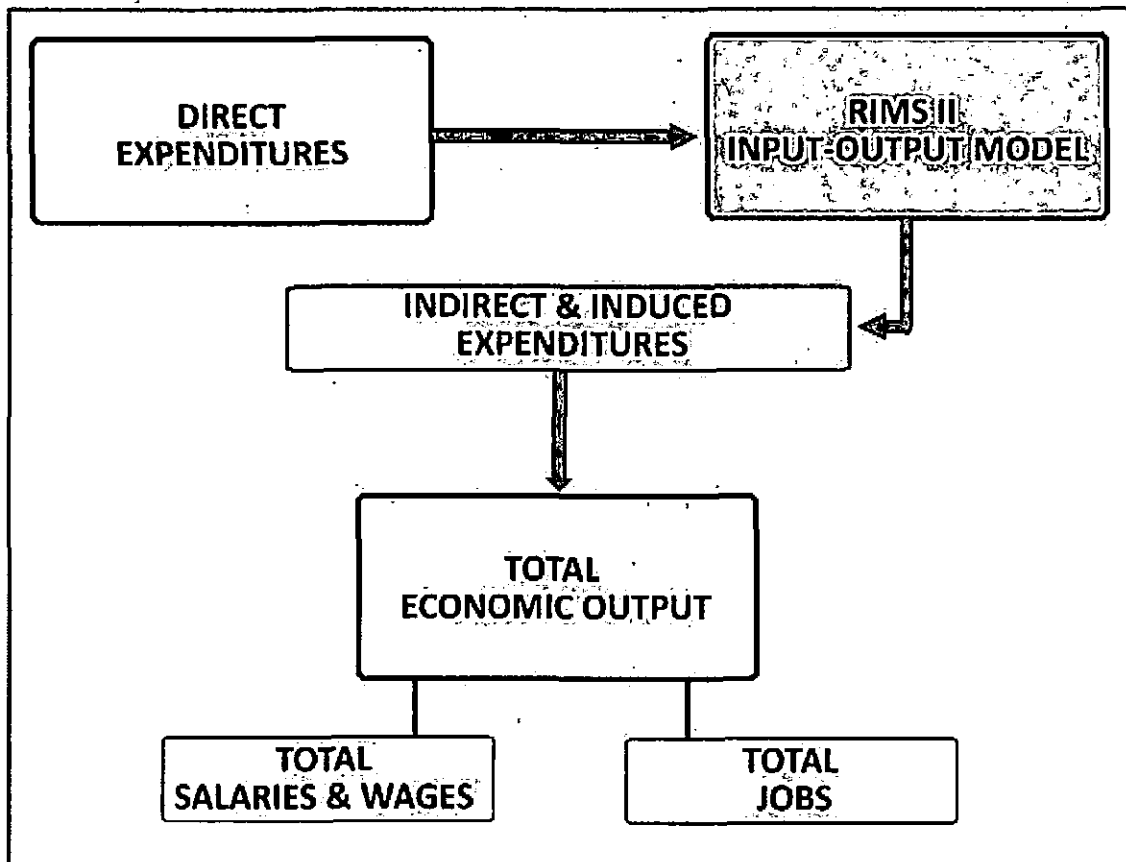
However, the economic impact on the region does not stop with that initial direct expenditure. Regional suppliers to that industry have also been called upon to increase their production to meet the needs of the industry to produce the \$1 million in goods sold. Further, suppliers of these same suppliers must also increase production to meet their increased needs as well. These are referred to as indirect expenditures. In addition, these direct and indirect expenditures require workers, and these workers must be paid for their labor. These wages and salaries will, in turn, be spent in part on goods and services produced locally, engendering another round of impacts. These are referred to as induced expenditures.

Direct expenditures are fed into a model constructed by Econsult Solutions, Inc. and based on RIMS II data. The model then produces a calculation of the total expenditure effect on the regional economy. This total effect includes the initial direct expenditure effect, as well as the ripple effects described, the indirect and induced expenditure effects (see Figure A.1).

Part of the total expenditure effect is actually the increase in total wages and salaries (usually referred to as earnings), which the model can separate from the expenditure estimates. Direct payroll estimates are fed into the "household" industry of the input-output model. Impacts of this industry are estimated using the personal consumption expenditure breakdown of the national input-output table and are adjusted to account for regional consumption spending and leakages from personal taxes and savings. The direct, indirect, and induced earnings represent a component of the total economic impact attributable to wages and salaries. Finally, the model calculates the total expenditures affecting the various industries and translates this estimate into an estimate of the total labor (or jobs) required to produce this output.

In short, the input-output model estimates the total economic activity in a region that can be attributed to the direct demand for the goods or services of various industries. This type of approach is used to estimate the total economic activity attributable to the expenditures associated with various types of spending in the region (see Figure A.1 and Table A.1).

Figure A.1 – Flowchart of Input-Output Methodology for Estimating Economic Impact



Source: Econsult Corporation (2009)

Table A.1 – Glossary of Terms for Input-Output Models

Multiplier Effect – the notion that initial outlays have a ripple effect on a local economy, to the extent that direct expenditures lead to indirect and induced expenditures.
Economic Impacts – total expenditures, employment, and earnings generated.
Fiscal Impacts – local and/or state tax revenues generated.
Direct Expenditures – initial outlays usually associated with the project or activity being modeled; examples: one-time upfront construction and related expenditures associated with a new or renovated facility; annual expenditures associated with ongoing facility maintenance and/or operating activity.
Direct Employment – the full time equivalent jobs associated with the direct expenditures.
Direct Earnings – the salaries and wages earned by employees and contractors as part of the direct expenditures.
Indirect Expenditures – indirect and induced outlays resulting from the direct expenditures; examples: vendors increasing production to meet new demand associated with the direct expenditures, workers spending direct earnings on various purchases within the local economy.
Indirect Employment – the full time equivalent jobs associated with the indirect expenditures.
Indirect Earnings – the salaries and wages earned by employees and contractors as part of the indirect expenditures.
Total Expenditures – the sum total of direct expenditures and indirect expenditures.
Total Employment – the sum total of direct employment and indirect employment.
Total Earnings – the sum total of direct earnings and indirect earnings.
Total Value-Added – the sum total of contribution to Gross Domestic Product.

Source: Econsult Solutions, Inc. (2013)

A.4 Fiscal Impact Model

The RIMS II model provides estimates of the economic impact of a new project or program on the regional economy. It does not, however, estimate the fiscal impact of the increased economic activity on state and local governments. Econsult has constructed a model that takes the output from the RIMS II model and generates detailed estimates of the increases in state and local tax collections that arise from the new project. Those revenues are in fact a part of the total economic impact of a new project that is often ignored in conventional economic impact analyses.

The RIMS II model provides estimates of direct, indirect, and induced expenditures, earnings, and employment within the defined region. The EconSult fiscal impact model combines the RIMS II output with the relevant tax types and tax bases associated with the jurisdiction or jurisdictions for which fiscal impact is being modeled. Specifically, the estimated earnings supported by the direct, indirect, and induced expenditures generated by the model are used to apportion the net increase in the relevant tax bases and therefore in those tax revenue categories. The resulting estimates represent the projected tax revenue gains to the jurisdiction or jurisdictions as a result of the increased business activity and its attendant indirect and induced effects.


A.5 Sources

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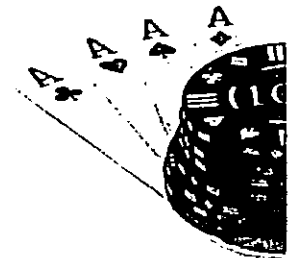
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EMPLOYMENT IMPACTS OF THE PROPOSED LAWRENCE DOWNS CASINO AND RACING RESORT



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EXECUTIVE SUMMARY

Endeka Entertainment is proposing to construct a standardbred racetrack and casino in Lawrence County in the Commonwealth of Pennsylvania. This development, when completed, would offer a premier gambling space with 1,250 slots, 41 table games, and 10 poker games, in addition to a harness track for horse racing. The facility, Lawrence Downs, would also offer between 220 and 240 restaurant seats for fine dining, and live music.

The purpose of this report is to identify and quantify the employment impacts associated with the construction and operation of the racetrack and casino, as well as with the visitor spending it will draw, in order to determine the amount of funding it may be eligible for through the US Citizenship and Immigration Services' EB-5 Immigrant Investor Program. For the purposes of this report, economic impacts are sized to the level of a subset of the Commonwealth that consists of Allegheny, Beaver, Butler, Mercer, and Lawrence counties (hereafter referred to as "the Region").

EB-5 eligible jobs include indirect employment from upfront construction phases and total employment (direct and indirect) from ongoing operations and visitor spending. It is estimated that the total EB-5 eligible jobs associated with Lawrence Downs is 1,180 to 2,723, which represents an eligibility of up to \$59 million to \$136 million in funding based on a ratio of \$500,000 in funding per 10 eligible jobs (see Table ES.1).

Table ES.1 – EB-5 Eligible Jobs Generated by Lawrence Downs Upfront Construction, Ongoing Operations, and Visitor Spending

Phase	Upfront Construction	Ongoing Operations Year 1	Visitor Spending	All Phases
Direct Employment	698	304	0-845	1,002-1,847
Indirect Employment	657	219	0-698	876-1,574
Total Employment	1,355	523	0-1,543	1,878-3,421
Eligible Employment	657	523	0-1,543	1,180-2,723
Eligible Funding (\$M)				\$59-\$136

Source: Endeka Entertainment (2013), US Department of Commerce (2011), Econsult Solutions, Inc. (2013)

1.0 INTRODUCTION

Endeka Entertainment is proposing to construct a standardbred racetrack and casino in Lawrence County in the Commonwealth of Pennsylvania. This development, when completed, would offer a premier gambling space with 1,250 slots, 41 table games, and 10 poker games, in addition to a harness track for horse racing. The facility, Lawrence Downs, would also offer between 220 and 240 restaurant seats for fine dining, and live music.

The location is within close proximity of both the Greater Pittsburgh area and Youngstown, Ohio. As such, it is likely to attract visitors from across state lines, resulting in an importation of purchasing power into the Commonwealth for the benefit of Commonwealth employment and Commonwealth tax revenues.

The purpose of this report is to identify and quantify the employment impacts associated with the construction and operation of the racetrack and casino, as well as with the visitor spending it will draw, in order to determine the amount of funding it may be eligible for through the US Citizenship and Immigration Services' EB-5 Immigrant Investor Program. For the purposes of this report, economic impacts are sized to the level of a subset of the Commonwealth that consists of Allegheny, Beaver, Butler, Mercer, and Lawrence counties (hereafter referred to as "the Region") (see Figure 1.1).

Figure 1.1 – Estimated Impact Region for Lawrence Downs



Source: ESRI (2013), Econsult Solutions, Inc. (2013)

2.0 ECONOMIC IMPACT METHODOLOGY

This report was produced by Econsult Solutions, Inc., a Philadelphia-based economic consulting firm. Econsult Solutions, Inc. has extensive experience in economic impact modeling, casino economic impact studies, and analyses in support of EB-5 application submissions.¹

Economic activity generated by Lawrence Downs, in the form of upfront construction, ongoing expenditures, and visitor spending, produces two kinds of spillover effects. First, locally sourced materials generate increased business activity for local vendors, who in turn ramp up their activities and their own sourcing; this is known as the indirect effect. Second, workers earn wages and in turn spend a portion of their earnings within their local economies; this is known as the induced effect. The composition and scale of these spillover effects can be modeled using Regional Input-Output Modeling System (RIMS II) multiplier data provided by the US Department of Commerce Bureau of Economic Analysis.²

In this way, one can model the total economic impact generated by Lawrence Downs. As noted above, this impact will be sized to the Region level. In other words, direct expenditures generate economic activity that ripples out from Lawrence Downs to touch the entire Region.³

The most recent RIMS II multipliers for the Region are from 2010. Therefore, all input expenditures are deflated to 2010 terms, so that they are expressed in the same terms as the multipliers.

¹ See Appendix A for additional detail on Econsult Solutions, Inc.

² See Appendix B for additional detail on input-output modeling.

³ See Appendix B.3 for additional detail on Econsult Solutions' economic impact methodology.

3.0 ECONOMIC IMPACTS OF UPFRONT CONSTRUCTION OF LAWRENCE DOWNS

3.1 Overview

The first way in which Lawrence Downs will generate impacts within the Region is through upfront construction. During the construction phase itself, Lawrence Downs will represent many temporary employment opportunities and a significant amount of new demand for vendors within the Region. This in turn generates spillover effects throughout the Region, supporting additional spending and employment.

3.2 Direct Expenditures from Upfront Construction

Total project costs for the casino and racetrack are anticipated to be about \$233 million, based on figures provided by Endeka Entertainment. These figures were examined and found to be within suitable industry averages for projects of this nature and scale, as based on comparable projects for which Econsult Solutions, Inc. has completed similar analyses.

Of this amount, about \$101 million is considered modelable in terms of its direct impact on the Region (see Table 3.1). Other expenditures are partially or fully excluded because they do not necessarily represent direct and immediate outlays within the Region and therefore are not likely to have nearly as much impact within the Region:

1. Land, financing, and contingencies are typically excluded from input-output analyses.
2. Slot machines and FFE typically involve out-of-state vendors, although a portion of these expenditures are in-state, representing the wholesaling, transportation, and installation of these items.
3. Cage cash and licensing fees do not represent construction expenditures.

**Table 3.1 – Summary of Modelable and Unmodelable Expenditures
Associated with Upfront Construction of Lawrence Downs (in \$M)**

Cost Category	Modelable	Unmodelable	Total
Construction	\$73.2	\$6.8	\$80.0
Design and Permit Fees	\$6.0	\$0.0	\$6.0
Testing, Utility Consumption	\$1.0	\$0.0	\$1.0
Signage	\$1.0	\$0.0	\$1.0
Finance Costs	\$0.0	\$12.0	\$12.0
Slots, Including Install	\$10.7	\$13.3	\$24.0
FFE	\$3.9	\$17.1	\$21.0
Pre-Opening Expense	\$5.0	\$0.0	\$5.0
Cage Cash	\$0.0	\$7.0	\$7.0
Licensing	\$0.0	\$68.0	\$68.0
Land	\$0.0	\$7.5	\$7.5
Total	\$100.8	\$131.8	\$232.5

Source: Endeika Entertainment (2013), Econsult Solutions, Inc. (2013)

Next, it is necessary to translate these costs with the year associated with the most recently available RIMS II multipliers (2010). Using the gross domestic product deflator provided by the St. Louis Federal Reserve, the modelable costs were deflated into 2010 dollars, resulting in direct modelable construction expenditures of \$97 million (see Table 3.2).

Table 3.2 – Modelable Expenditures Associated with Upfront Construction of Lawrence Downs (in 2010 \$M)

Cost Category	Modelable Cost	Modelable Cost (in 2010 terms)
Construction	\$73.2	\$70.1
Design and Permit Fees	\$6.0	\$5.7
Testing, Utility Consumption	\$1.0	\$1.0
Signage	\$1.0	\$1.0
Finance Costs	\$0.0	\$0.0
Slots, Including Install	\$10.7	\$10.2
FFE	\$3.9	\$3.7
Pre-Opening Expense	\$5.0	\$4.8
Cage Cash	\$0.0	\$0.0
Licensing	\$0.0	\$0.0
Land	\$0.0	\$0.0
Total	\$100.8	\$96.6

Source: Endeika Entertainment (2013), Econsult Solutions, Inc. (2013)

Finally, these cost categories must be assigned to RIMS II industry categories. This is done by using looking up the NAICS code for each cost category and converting from NAICS Code to RIMS II industry category (see Table 3.3).

Table 3.3 – Conversion of Upfront Construction Inputs into RIMS II Industry Categories

Cost Category	2010 \$M	NAICS	NAICS Description	RIMS II Code
Construction	\$70.1	236220	Commercial and Institutional Building Construction	7
Design and Permit Fees	\$5.7	541330	Engineering Services	48
Testing, Utility Consumption	\$1.0	238910	Site Preparation Contractors	7
Signage	\$1.0	339999	All Other Miscellaneous Manufacturing	18
Finance Costs	\$0.0	522320	Financial Transactions Processing, Reserve, and Clearinghouse Activities	42
Slots Install	\$5.7	541990	All Other Professional, Scientific, and Technical Services	48
Slots Wholesale Trade	\$3.7	420000	Wholesale Trade	27
Truck Transportation	\$0.8	484000	Truck Transportation	32
Rail Transportation	\$0.0	482000	Rail Transportation	30
FFE – Wholesale Trade	\$1.5	420000	Wholesale Trade	27
Truck Transportation	\$2.2	484000	Truck Transportation	32
Rail Transportation	\$0.0	482000	Rail Transportation	30
Pre-Opening Expense	\$4.8	713210	Casinos (except Casino Hotels)	58
Total	\$96.5			

Source: Endeka Entertainment (2013), US Department of Commerce (2011), FRED (2013), Econsult Solutions, Inc. (2013)

3.3 Economic Impact from Upfront Construction

The \$97 million in direct expenditures associated with upfront construction of Lawrence Downs will have a significant impact on the Region economy (see Table 3.4). Within the Region, there will be a one-time impact of about \$190 million, supporting about 1,400 jobs and about \$60 million in earnings. The employment estimate of about 1,400 jobs

supported by upfront construction is determined by applying the appropriate RIMS II multipliers to the modelable expenditures (see Table 3.5).

Table 3.4 – Economic Impact of Upfront Construction of Lawrence Downs on the Five-County Region

Upfront Construction	Within the Region
Direct Expenditures (\$M)	\$96.6
Indirect & Induced Expenditures (\$M)	\$92.0
Total Expenditures (\$M)	\$188.6
Total Employment (Jobs)	1,355
Total Earnings (\$M)	\$57

Source: Endeika Entertainment (2013), US Department of Commerce (2011), Econsult Solutions, Inc. (2013)

Table 3.5 – Conversion of Upfront Construction Inputs into Estimated Jobs

Cost Category	RIMS II Code	2010 \$M	Jobs Multiplier	Estimated Jobs
Construction	7	\$70.1	13.91	975.4
Design and Permit Fees	48	\$5.7	13.72	78.9
Testing, Utility Consumption	7	\$1.0	13.91	13.4
Signage	18	\$1.0	9.03	9.0
Finance Costs	42	\$0.0	8.36	0.0
Slots Install	48	\$5.7	13.72	78.2
Slots Wholesale Trade	27	\$3.7	9.85	36.4
Truck Transportation	32	\$0.8	12.18	9.7
Rail Transportation	30	\$0.0	7.91	0.0
FFE – Wholesale Trade	27	\$1.5	9.85	14.8
Truck Transportation	32	\$2.2	12.18	26.8
Rail Transportation	30	\$0.0	7.91	0.0
Pre-Opening Expense	58	\$4.8	23.40	112.3
Total		\$96.5		1,354.9

Source: Endeka Entertainment (2013), US Department of Commerce (2011), FRED (2013), Econsult Solutions, Inc. (2013)

3.4 Industry Distribution of Economic Impact from Upfront Construction

While the construction industry will benefit the most from upfront construction of Lawrence Downs, other industries will gain as well (see Table 3.6). It is estimated that within the Region, about 62 percent of the one-time expenditure impact and about 63 percent of the temporary employment impact will be in industries besides construction.

Table 3.6 – Industry Distribution of Economic Impact of Upfront Construction of Lawrence Downs on the Five-County Region

Expenditure Impact within the Region	%	Employment Impact within the Region	%
Construction	38.1%	Construction	37.0%
Professional, scientific, and technical services	11.1%	Professional, scientific, and technical services	10.4%
Manufacturing	8.2%	Retail trade	8.0%
Real estate and rental and leasing	6.2%	Arts, entertainment, and recreation	7.2%
Wholesale trade	5.3%	Health care and social assistance	5.9%
All other industries	31.0%	All other industries	31.5%

Source: Endeka Entertainment (2013), US Department of Commerce (2011), Econsult Solutions, Inc. (2013)

4.0 ECONOMIC IMPACTS OF ONGOING OPERATIONS OF LAWRENCE DOWNS

4.1 Overview

The second way in which Lawrence Downs will generate impacts within the Region is through ongoing operations. Once construction has been completed, Lawrence Downs will represent many permanent employment opportunities and a significant amount of new ongoing demand for vendors within the Region. This in turn generates spillover effects throughout the Region, supporting additional spending and employment.

4.2 Direct Expenditures from Year 1 Ongoing Operations

Projected Year 1 operations figures were provided by Endeka Entertainment. These figures were examined and found to be within suitable industry averages for projects of this nature and scale, as based on comparable projects for which Econsult Solutions, Inc. has completed similar analyses.

As with the approach with upfront construction expenditures, two adjustments must be made to projected expenditures:

1. First, a distinction must be made between modelable and unmodelable expenditures, with the latter being excluded from input-output analysis because they do not necessarily represent local expenditures that have a multiplier effect within the Region. In this case, a significant portion of operating expenditures is accounted for in gaming taxes paid, for which it cannot be assumed those funds are necessarily used immediately within the Region with an attendant benefit to the Region economy.
2. Second, the modelable expenditure numbers must be adjusted to 2010 terms so that it is expressed in the same terms as the multipliers used to estimate total economic impact.

This two-step approach yields an estimated annual operating expenditure amount of about \$37 million (see Table 4.1).

Table 4.1 – Summary of Modelable and Unmodelable Expenditures Associated with Year 1 Ongoing Operations of Lawrence Downs (in \$M)

Expenditure Category	Total	Modelable	Modelable (2010\$)
Gaming Taxes	\$56.9	\$0.0	\$0.0
Cost of Goods Sold	\$3.2	\$3.2	\$3.1
Labor	\$13.7	\$13.7	\$13.1
Marketing	\$2.2	\$2.2	\$2.1
Other Expense	\$9.0	\$9.0	\$8.6
Management Fee	\$2.0	\$0.0	\$0.0
Other Fees	\$0.5	\$0.0	\$0.0
Rent	\$10.0	\$10.0	\$9.6
Depreciation	\$7.8	\$0.0	\$0.0
Interest Expense	\$4.0	\$0.0	\$0.0
State Taxes	\$0.0	\$0.0	\$0.0
Federal Taxes	\$0.0	\$0.0	\$0.0
Total	\$109.3	\$38.1	\$36.5

Source: Endeka Entertainment (2013), US Department of Commerce (2011), Econsult Solutions, Inc. (2013)

These cost categories must be assigned to RIMS II industry categories. This is done by using looking up the NAICS code for each cost category and converting from NAICS Code to RIMS II industry category (see Table 4.2).

Table 4.2 – Conversion of Year 1 Ongoing Operations Inputs into RIMS II Industry Categories

Expenditure Category	2010 \$M	NAICS	NAICS Description	RIMS II Code
Cost of Goods Sold	\$3.1	713210	Casinos (except Casino Hotels)	58
Labor	\$13.1			62 ⁴
Marketing	\$2.1	541610	Marketing Consulting Services	48
Other Expense	\$8.6	713210	Casinos (except Casino Hotels)	58
Management Fee	\$0.0	551114	Corporate, Subsidiary, and Regional Managing Offices	49
Other Fee (.5% of Net Revenue)	\$0.0	551114	Corporate, Subsidiary, and Regional Managing Offices	49
Rent	\$9.6	531190	Lessors of Other Real Estate Property	46
Total	\$36.5			

Source: Endeka Entertainment (2013), US Department of Commerce (2011), FRED (2013), Econsult Solutions, Inc. (2013)

4.3 Economic Impact from Year 1 Ongoing Operations

The \$37 million in direct expenditures associated with ongoing operations of Lawrence Downs will have a significant impact on the Region economy (see Table 4.3). Within the Region, there will be an annual impact of about \$55 million, supporting about 520 jobs and about \$22 million in earnings. The employment estimate of about 520 jobs supported by ongoing operations is determined by applying the appropriate RIMS II multipliers to the modelable expenditures (see Table 4.4).

⁴ "Labor" is categorized in the RIMS II industry of "Households" to denote household earnings.

Table 4.3 – Economic Impact of Year 1 Ongoing Operations of Lawrence Downs on the Five-County Region

Ongoing Operations	Within the Region
Direct Expenditures (\$M)	\$36.5
Indirect & Induced Expenditures (\$M)	\$17.8
Total Expenditures (\$M)	\$54.3
Total Employment (Jobs)	512
Total Earnings (\$M)	\$13

Source: Endeka Entertainment (2013), US Department of Commerce (2011), Econsult Solutions, Inc. (2013)

Table 4.4 – Conversion of Year 1 Ongoing Operations Inputs into Estimated Jobs

Cost Category	RIMS II Code	2010 \$M	Jobs Multiplier	Estimated Jobs
Cost of Goods Sold	58	\$3.1	23.40	72.5
Labor	62	\$13.1	9.33	122.2
Marketing	48	\$2.1	13.72	28.8
Other Expense	58	\$8.6	23.40	201.2
Rent	46	\$9.6	9.07	87.1
Total		\$36.4		511.9

Source: Endeka Entertainment (2013), US Department of Commerce (2011), FRED (2013), Econsult Solutions, Inc. (2013)

4.4 Industry Distribution of Economic Impact from Year 1 Ongoing Operations

While the real estate and entertainment industries will benefit the most from ongoing operations of Lawrence Downs, other industries will gain as well (see Table 4.5). It is estimated that within the Region, about 72 percent of the annual expenditure impact to the Region, and 75 percent of the expenditure impact to the Commonwealth will benefit other industries besides real estate. For the employment impact, 58 percent of the employment impact in the Region, and 60 percent of the employment impact will benefit other industries besides entertainment.

Table 4.5 – Industry Distribution of Economic Impact of Year 1 Ongoing Operations of Lawrence Downs on the Five-County Region and the Commonwealth of Pennsylvania

Expenditure Impact within the Region	%	Employment Impact within the Commonwealth	%
Real estate and rental and leasing	27.3%	Real estate and rental and leasing	24.6%
Arts, entertainment, and recreation	22.3%	Arts, entertainment, and recreation	20.0%
Finance and insurance	8.9%	Finance and insurance	9.0%
Professional, scientific, and technical services	7.5%	Professional, scientific, and technical services	7.4%
Health care and social assistance	7.0%	Manufacturing	7.3%
All other industries	27.3%	All other industries	31.7%
Employment Impact within the Region	%	Employment Impact within Commonwealth	%
Arts, entertainment, and recreation	41.6%	Arts, entertainment, and recreation	39.5%
Real estate and rental and leasing	17.1%	Real estate and rental and leasing	14.3%
Health care and social assistance	7.2%	Health care and social assistance	7.4%
Retail trade	6.8%	Retail trade	7.2%
Professional, scientific, and technical services	5.4%	Professional, scientific, and technical services	5.3%
All other industries	22.1%	All other industries	26.2%

Source: Endeka Entertainment (2013), US Department of Commerce (2011), Econsult Solutions, Inc. (2013)

5.0 ECONOMIC IMPACTS OF VISITOR SPENDING ATTRACTED BY LAWRENCE DOWNS

5.1 Overview

A third and important way in which Lawrence Downs will generate impacts within the Region is by attracting visitors to the Region. In other words, Lawrence Downs will represent the importation of many visitors into the Region, whose spending supports employment and generates tax revenue within the Region.

5.2 Direct Expenditures from Visitor Spending

This category of direct expenditures associated with spending by visitors is by far the most difficult one to estimate, because of the many relative unknowns: how many people will visit the proposed development, where will they come from, and what will they spend their money on. This analysis was informed by numbers provided by Endeka Entertainment and by consultants engaged by Endeka Entertainment in analyzing market demand and visitor composition, as well as by independent research and analysis.⁵⁵ These figures were examined and found to be within suitable industry averages for projects of this nature and scale, as based on comparable projects for which Econsult Solutions, Inc. has completed similar analyses.

Three data points from a November 2009 report by the Innovation Group were used as a starting point. First is the number and geographic distribution of visitors to Lawrence Downs, as determined by capture rates from other nearby destinations. Based on that analysis, it is estimated that the proposed development will see about 2.91 million visitors per year, of which about 2.0 million will be coming from outside the Commonwealth (see Table 5.1).

⁵⁵ The following reports were reviewed as part of this analysis and of the estimation of direct expenditures from visitor spending; all were produced by professional service firms with significant experience in casino and related analyses.

- "Lawrence Downs Casino and Racetrack Traffic Impact Assessment," Pennoni Associates Inc. (March 2013).
- "Lawrence Downs: Gross Gaming Revenue Projections, With and Without Casinos in Ohio," Spectrum Gaming Group (December 22, 2009).
- "Lawrence Downs," Innovation Group (November 2009).
- "Lawrence Downs LP Pennsylvania Harness Track Application Market Study," Cummins Associates (August 16, 2007).

Table 5.1 – Estimated Visitors to Lawrence Downs, as Captured from Other Nearby Destinations

Market Segment	Market Visits	Capture Rate	# Captured	# New to PA
Akron	1,351,626	12.0%	162,195	162,195
Cleveland	4,606,648	5.3%	244,152	244,152
NE Ohio	952,855	20.2%	192,477	192,477
Pittsburgh	7,981,994	4.0%	319,280	0
Pittsburgh Sec East	623,146	6.8%	42,374	0
Presque Isle	1,197,576	0.5%	5,988	0
Presque Isle Sec	184,241	9.7%	17,871	0
Presque Isle Ter	136,486	9.1%	12,420	0
Primary	2,316,926	78.9%	1,828,055	1,279,638
Salamanca	249,854	1.8%	4,497	4,497
Tertiary South	299,610	2.2%	6,591	6,591
Tertiary SW	513,346	1.2%	6,160	6,160
WV Casinos- Primary	1,006,588	2.2%	22,145	22,145
WV Casinos Sec South	153,105	2.1%	3,215	3,215
WV Casinos Sec West	417,385	10.8%	45,078	45,078
Total	21,991,386	13.2%	2,912,499	1,966,149

Source: Endeka Entertainment (2013), Innovation Group (2009), Econsult Solutions, Inc. (2013)

Second is the number of current hotel guests near Lawrence Downs that will choose to visit once it has opened. It is estimated that this will add an additional 62,000 visitors (see Table 5.2).

Table 5.2 – Estimated Visitors to Lawrence Downs, as Captured from Nearby Hotels

Nearby Hotel Rooms	Occupancy Rate	Annual # Rooms	Capture Rate	# Visits
4,420	70%	1,129,310	5.50%	62,112

Source: Endeka Entertainment (2013), Innovation Group (2009), Econsult Solutions, Inc. (2013)

Third is the number of drivers passing by Lawrence Downs that will choose to visit once it has opened. It is estimated that this will add an additional 82,000 visitors (see Table 5.3).

Table 5.3 – Estimated Visitors to Lawrence Downs, as Captured from Nearby Hotels

Highway	Avg Daily Traffic	Passthru %	Adults /Vehicle	Capture Rate	# Visits	# New to PA
Hwy 422	5,731	35%	1.5	1.7%	18,669	0
Hwy 60	15,920	25%	1.5	1.7%	37,044	37,044
Hwy 80	30,780	30%	1.5	0.9%	45,501	45,501
I 76	23,350	30%	1.5	0.6%	23,011	0
Total	75,781				124,225	82,544

Source: Endeka Entertainment (2013), Innovation Group (2009), Econsult Solutions, Inc. (2013)

These visitors are sorted into spending profile categories – in town, out of town day trip, and out of town overnight (see Table 5.4) – and each spending profile category is given an estimated per-person spending amount (see Table 5.5). Multiplying through yields an estimated \$104 million per year in spending generated by visitors of the proposed development, of which about \$64 million is considered new to the Commonwealth (see Table 5.6). Note that this spending does not include that which takes place at Lawrence Downs since those dollars are already accounted for in the ongoing operations figures from the previous section, but are rather additional dollars spent outside of Lawrence Downs at other locations.

Table 5.4 – Estimated Distribution of Visitors to Lawrence Downs, by Spending Profile Category

Market Segment	In-Town – Not New to PA	In-Town – New to PA	Out of Town – Day Trip	Out of Town – Overnight
Akron			162,195	
Cleveland			244,152	
NE Ohio		192,477		
Pittsburgh	319,280			
Pittsburgh Sec East	42,374			
Presque Isle	5,988			
Presque Isle Sec	17,871			
Presque Isle Ter	12,420			
Primary	914,028	914,028		
Salamanca				4,497
Tertiary South				6,591
Tertiary SW				6,160
WV Casinos- Primary		22,145		
WV Casinos Sec South			3,215	
WV Casinos Sec West			45,078	
Total	1,311,961	1,128,650	454,640	17,248

Source: Endeka Entertainment (2013), Innovation Group (2009), Econsult Solutions, Inc. (2013)

Table 5.5 – Estimated Spending Profile Details for Visitors to Lawrence Downs, by Spending Profile Category

Expenditure Category	In-Town – Not New to PA	In-Town – New to PA	Out of Town – Day Trip	Out of Town – Overnight
Transportation	\$10	\$10	\$20	\$40
Accommodations				\$80
Food/Retail/Entertainment	\$20	\$20	\$40	\$60
Total	\$30	\$30	\$60	\$180

Source: US Bureau of Labor Statistics (2009), US General Service Administration (2009), Econsult Solutions, Inc. (2013)

Table 5.6 – Estimated Visitor Spending Generated by Lawrence Downs

	In-Town – Not New to PA	In-Town – New to PA	Out of Town – Day Trip	Out of Town – Overnight	Total
Estimated # Visitors (\$M)	1.31	1.13	0.45	0.02	2.91
Estimated Spending/Visitor	\$30	\$30	\$60	\$180	
Total Spending (\$M)	\$39.4	\$33.9	\$27.3	\$3.1	\$103.6
Total Spending New to PA (\$M)		\$33.9	\$27.3	\$3.1	\$64.2

Source: Endeika Entertainment (2013), Innovation Group (2009), US Bureau of Labor Statistics (2009), US General Service Administration (2009), Econsult Solutions, Inc. (2013)

These cost categories must be assigned to RIMS II industry categories. This is done by using looking up the NAICS code for each cost category and converting from NAICS Code to RIMS II industry category (see Table 4.2).

Table 5.7 – Conversion of Year 1 Ongoing Operations Inputs into RIMS II Industry Categories

Expenditure Category	2010 \$M	NAICS	NAICS Description	RIMS II Code
Transit and Ground Passenger Transportation	\$20.8	485113	Bus and Other Motor Vehicle Transit Systems	33
Accommodation	\$1.4	721110	Hotels (except Casino Hotels) and Motels	59
Food Services and Drinking Places	\$42.0	722110	Full-Service Restaurants	60
Total	\$64.2			

Source: Endeka Entertainment (2013), US Department of Commerce (2011), FRED (2013), Econsult Solutions, Inc. (2013)

5.3 Economic Impact from Visitor Spending

The \$64 million in direct expenditures associated with visitor spending attracted by Lawrence Downs will have a significant impact on the Region economy (see Table 5.8). Within the Region, there will be an annual impact of about \$116 million, supporting about 1,500 jobs and about \$35 million in earnings. The employment estimate of about 520 jobs supported by ongoing operations is determined by applying the appropriate RIMS II multipliers to the modelable expenditures (see Table 5.9).

Table 5.8 – Economic Impact of Visitor Spending Attracted by Lawrence Downs on the Five-County Region

Visitor Spending	Within the Region
Direct Expenditures (\$M)	\$64.2
Indirect & Induced Expenditures (\$M)	\$52.2
Total Expenditures (\$M)	\$116.4
Total Employment (Jobs)	1,543
Total Earnings (\$M)	\$35

Source: Endeka Entertainment (2013), US Department of Commerce (2011), Econsult Solutions, Inc. (2013)

Table 5.9 – Conversion of Visitor Spending Inputs into Estimated Jobs

Cost Category	RIMS II Code	2010 \$M	Jobs Multiplier	Estimated Jobs
Transit and Ground Passenger Transportation	33	\$20.8	24.90	517.9
Accommodation	59	\$1.4	16.62	23.3
Food Services and Drinking Places	60	\$42.0	23.82	1,000.4
Total		\$64.2		1,541.6

Source: Endeka Entertainment (2013), US Department of Commerce (2011), FRED (2013), Econsult Solutions, Inc. (2013)

5.4 Industry Distribution of Economic Impact from Visitor Spending

While the food and drink industry will benefit the most from ongoing operations of Lawrence Downs, other industries will gain as well (see Table 5.10). It is estimated that within the Region, about 62 percent of the annual expenditure impact and about 42 percent of the permanent employment impact will be in industries besides food and drink.

Table 5.10 – Industry Distribution of Economic Impact of Visitor Spending Attracted by Lawrence Downs on the Five-County Region

Expenditure Impact within the Region	%	Employment Impact within the Region	%
Food services and drinking places	37.5%	Food services and drinking places	58.2%
Transportation and warehousing	19.8%	Transportation and warehousing	31.3%
Real estate and rental and leasing	6.6%	Retail trade	3.7%
Manufacturing	5.6%	Health care and social assistance	3.6%
Finance and insurance	4.8%	Real estate and rental and leasing	3.2%
All other industries	25.7%	All other industries	12.7%

Source: Endeka Entertainment (2013), US Department of Commerce (2011), Econsult Solutions, Inc. (2013)

6.0 EB-5 ELIGIBLE EMPLOYMENT IMPACT

6.1 Overview

Determining eligibility for funding through the US Citizenship and Immigration Services' EB-5 Immigrant Investor Program requires not only estimating the number of jobs that may be supported by the applicant project but also whether these represent net new jobs supported instead of jobs that are supported by existing activity that is shifting from elsewhere. Therefore, the purpose of this section is to discuss to what extent the jobs supported by upfront construction, ongoing operations, and visitor spending of Lawrence Downs are in fact net new jobs, and from there to determine what level of EB-5 funding Lawrence Downs may be eligible for.

6.2 Net New Job Creation in Upfront Construction and Ongoing Operations

Continued high unemployment suggests that the temporary jobs created by upfront construction of Lawrence Downs and the permanent jobs created by ongoing operations of Lawrence Downs will in fact result in net new job creation commensurate with the estimates made in this report. This is because the existence of the high number of job seekers currently residing in the Region means that many openings associated with upfront construction and ongoing operations will be filled by people who are not currently employed. Furthermore, if any openings are filled by people who are currently employed, those internal shifts in turn create openings that can be filled by the currently unemployed. Therefore, it is believed that the job estimates for upfront construction and ongoing operations do in fact represent net new job creation.

Table 6.1 – Unemployment Rate by County

County	Population over 16	Population over 16 in Labor Force	Unemployed	Unemployment Rate
Butler	146,876	96,103	6,089	6.3%
Beaver	140,437	86,542	5,496	6.4%
Mercer	95,104	54,709	4,808	8.8%
Lawrence	74,266	43,861	3,298	7.5%
Allegheny	1,011,067	644,951	46,397	7.2%
Region Total	1,467,750	926,166	66,088	7.1%

Source: American Community Survey (2012), Econsult Solutions, Inc. (2013)

6.3 Net New Job Creation in Visitor Spending

Conversely, visitor spending may partially or fully represent an internal shifting of spending and therefore of supported employment. This is less true at more localized levels than at larger levels, and at a national level it is possible that visitor spending is fully represented by internal shifting of existing spending rather than the creation of new spending. Therefore, net new jobs supported by visitor spending may be as high as the estimates made in the previous section (i.e. all visitor spending is net new and therefore so are the jobs supported by it) and as low as zero (i.e. all visitor spending is shifted from existing locations and therefore there are no net new jobs supported by it).

6.4 EB-5 Eligible Jobs

EB-5 eligible jobs include indirect employment from upfront construction phases and total employment (direct and indirect) from all other phases. As noted above, it is possible that the visitor spending employment impacts are partially or fully representative of internal shifting of jobs rather than net new creation of jobs, and therefore a range of eligible jobs is presented for that phase. Based on this approach, the total EB-5 eligible jobs associated with Lawrence Downs is 1,180 to 2,723, which represents an eligibility of up to \$59 million to \$136 million in funding based on a ratio of \$500,000 in funding per 10 eligible jobs (see Table 6.2).

Table 6.2 – EB-5 Eligible Jobs Generated by Lawrence Downs Upfront Construction, Ongoing Operations, and Visitor Spending

Phase	Upfront Construction	Ongoing Operations Year 1	Visitor Spending	All Phases
Direct Employment	698	304	0-845	1,002-1,847
Indirect Employment	657	219	0-698	876-1,574
Total Employment	1,355	523	0-1,543	1,878-3,421
Eligible Employment	657	523	0-1,543	1,180-2,723
Eligible Funding (\$M)				\$59-\$136

Source: Endeika Entertainment (2013), US Department of Commerce (2011), Econsult Solutions, Inc. (2013)

APPENDIX A – ABOUT ECONSULT SOLUTIONS, INC.

Econsult Solutions, Inc. provides businesses and public policy makers with economic consulting services in urban economics, real estate economics, transportation, public infrastructure, development, public policy and finance, community and neighborhood development, planning, as well as litigation support.

Econsult Solutions has the capability to engage in projects of any size, from comprehensive long-term studies involving complicated economic arguments and extensive data analysis, to short-term advisory support. Whether working independently or on joint-venture projects, our flexibility and customized approach allow us to respond to a vast range of client needs.

Our scope is large, and our expertise specific. Econsult assists clients in the evaluation of economic and fiscal outcomes of programs and developments, offers city and regional planning insight and advice, provides GIS analytic services, yields financial projections and advises investors and governments on projects, developments, and policy outcomes, and has the economic skills and expertise to process, analyze and manage large and complex datasets.

Our Principals and Senior Advisors include nationally recognized experts in urban development, real estate, government and public policy, planning, transportation, non-profit management, business strategy and administration, as well as litigation and commercial damages. Staff members have outstanding credentials, including active positions at the university level, wide experience at the highest levels of the public policy process and extensive consulting experience.

APPENDIX B – ECONOMIC IMPACT METHODOLOGY

B.1 History

The theory behind input-output modeling stretches as far back as the mid 17th century, when Sir William Petty described the interconnectedness of “production, distribution, and wealth disposal.” While Petty can be credited with noticing links between economies, input-output modeling did not begin to take true form until the mid 18th century, when French physician François Quesnay created the *Tableau Économique*. His work detailed how a landowner spends his earnings on goods from farms and merchants, who in turn spend their money on a host of goods and services. Over the course of the century, an algebraic framework was added by Achille-Nicholas Isnard. Robert Torrens and Léon Walras refined the model by establishing the connections between profits and production.

The modern input-output system can be attributed to Wassily Leontief. In his thesis, “The Economy as a Circular Flow” (1928), he outlined the economy as an integrated system of linear equations relating inputs and outputs. This framework soon gained popularity, and became a widely accepted analytical tool. In 1936, Leontief produced the first input-output analysis of the US. Leontief’s work became the US Department of Commerce’s Bureau of Economic Analysis’s (BEA) standard benchmark for US production in the 1950’s. Leontief received a Nobel Prize for his work in 1973.

By the 1970’s, the BEA had developed regional multipliers that could benchmark regional production throughout the US. Through extensive surveying, the impacts of each industry could be determined at the individual county level. These multipliers later became known as the Regional Input-Output Modeling System, RIMS. These multipliers would later be improved in the 1980’s and reclassified as RIMS II multipliers. This new system soon became a trusted standard in economic impact studies. The updated RIMS II multipliers show the effect on the local economy that localized expenditures have in terms of employment, output, and earnings.

B.2 Application

The use and application of multipliers are fairly basic and intuitive. Multipliers, in their most basic form, are the result of an algebraic analysis expressing how two inputs are interconnected in the production of an output. The result of the equation generates a multiplier that is broken down into direct, indirect, and induced effects. In a generalized example: if the multiplier for good “X” to good “Y” is 3, then the direct of good “X” on “Y” is 1, with indirect and induced effects of 2. Essentially, every unit of good “X” supports 2 units of good “Y”.

When implemented on a large complex scale, such as that of the US economy or any subsection of it, multiplier effects across industries can be complicated. However, the same general concept comes into play. Each industry has largely different and varied inputs into other industries. The quantity of the output is largely decided by the scale and efficiency of the industries involved. As a result, the sum of those inputs equates to an output product plus a value added/component. By arranging these inputs and outputs by industry in a matrix, and performing some algebra to find the Leontief inverse matrix, each industry's effect on final demand can be estimated. Additionally, the direct, indirect, and induced effects can also be determined. Direct effects include direct purchases for production, indirect effects include expenses during production, and induced effects concern the expenditures of employees directly involved with production. Using building construction as an example, the direct effects would include materials, brick, steel, and mortar, the indirect effects would involve the steel fabrication, concrete mixing, and the induced effects would consider the construction workers purchases from their wages. While impacts vary in size, each industry has rippling effects throughout the economy. By using an input-output model, these effects can be more accurately quantified and explained.

RIMS II is one of several popular choices for regional input-output modeling. Each system has its own nuances in establishing proper location coefficients. RIMS II uses a location quotient to determine its regional purchase coefficient (RPC). This represents the proportion of demand for a good that is filled locally; this assessment helps determine the multiplier for the localized region. RIMS II takes the multipliers and divides them into over 500 industry categories in accordance to the North American Industrial Classification System (NAICS) codes. A comprehensive breakdown of a region's multipliers by industry can be shown.

Despite the usefulness of input-output modeling, there are some shortcomings to the system. Notably, input-output models ignore economies of scale. Input-output models assume that costs and inputs remain proportionate through different levels of production. Further, multipliers are not generally updated on a timely basis; most multipliers are prone to be outdated with the current economy. If the multipliers are sourced from a year of a recession economy, the multipliers may not accurately represent the flows from an economic boom period. Additionally, the multipliers may not capture sudden legal or technological changes which may improve or decrease efficiency in the production process. Regardless, I-O models still serve as the standard in the estimation of local and regional impacts.

B.3 Economic Impact Model

The methodology and input-output model used in this economic impact analysis are considered standard for estimating such expenditure impacts, and the results are typically recognized as reasonable and plausible effects, based on the assumptions (including data) used to generate the impacts. In general, one can say that any economic activity can be described in terms of the total output generated from every dollar of direct expenditures. If an industry in a given region sells \$1 million of its goods, there is a direct infusion of \$1 million into the region. These are referred to as direct expenditures.

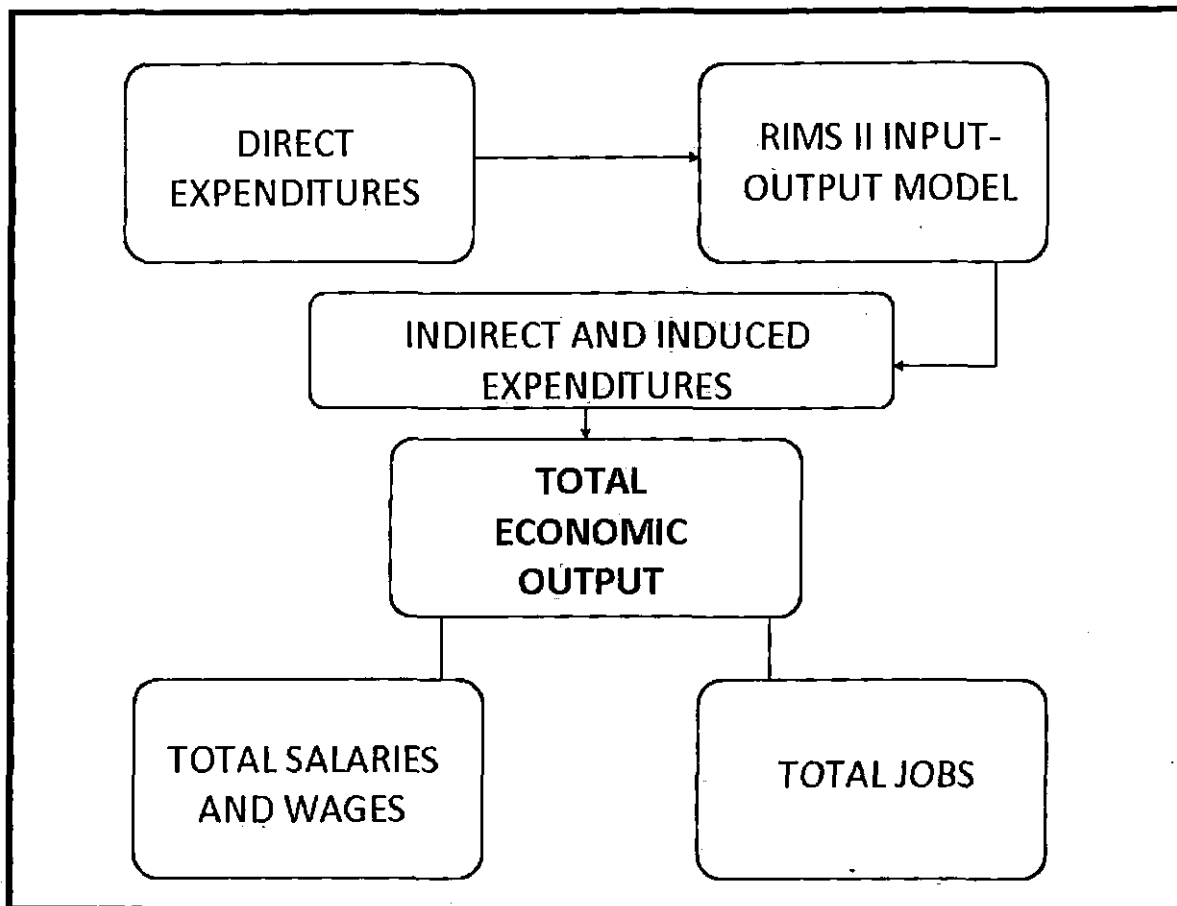
However, the economic impact on the region does not stop with that initial direct expenditure. Regional suppliers to that industry have also been called upon to increase their production to meet the needs of the industry to produce the \$1 million in goods sold. Further, suppliers of these same suppliers must also increase production to meet their increased needs as well. These are referred to as indirect expenditures. In addition, these direct and indirect expenditures require workers, and these workers must be paid for their labor. These wages and salaries will, in turn, be spent in part on goods and services produced locally, engendering another round of impacts. These are referred to as induced expenditures.

Direct expenditures are fed into a model constructed by Econsult Solutions, Inc. and based on RIMS II data. The model then produces a calculation of the total expenditure effect on the regional economy. This total effect includes the initial direct expenditure effect, as well as the ripple effects described, the indirect and induced expenditure effects (see Figure A.1).

Part of the total expenditure effect is actually the increase in total wages and salaries (usually referred to as earnings), which the model can separate from the expenditure estimates. Direct payroll estimates are fed into the "household" industry of the input-output model. Impacts of this industry are estimated using the personal consumption expenditure breakdown of the national input-output table and are adjusted to account for regional consumption spending and leakages from personal taxes and savings. The direct, indirect, and induced earnings represent a component of the total economic impact attributable to wages and salaries. Finally, the model calculates the total expenditures affecting the various industries and translates this estimate into an estimate of the total labor (or jobs) required to produce this output.

In short, the input-output model estimates the total economic activity in a region that can be attributed to the direct demand for the goods or services of various industries. This type of approach is used to estimate the total economic activity attributable to the expenditures associated with various types of spending in the region (see Figure B.1 and Table B.1).

Figure B.1 – Flowchart of Input-Output Methodology for Estimating Economic Impact



Source: Econsult Corporation (2009)

Table B.1 – Glossary of Terms for Input-Output Models

Multiplier Effect – the notion that initial outlays have a ripple effect on a local economy, to the extent that direct expenditures lead to indirect and induced expenditures.
Economic Impacts – total expenditures, employment, and earnings generated.
Fiscal Impacts – local and/or state tax revenues generated.
Direct Expenditures – initial outlays usually associated with the project or activity being modeled; examples: one-time upfront construction and related expenditures associated with a new or renovated facility, annual expenditures associated with ongoing facility maintenance and/or operating activity.
Direct Employment – the full time equivalent jobs associated with the direct expenditures.
Direct Earnings – the salaries and wages earned by employees and contractors as part of the direct expenditures.
Indirect Expenditures – indirect and induced outlays resulting from the direct expenditures; examples: vendors increasing production to meet new demand associated with the direct expenditures, workers spending direct earnings on various purchases within the local economy.
Indirect Employment – the full time equivalent jobs associated with the indirect expenditures.
Indirect Earnings – the salaries and wages earned by employees and contractors as part of the indirect expenditures.
Total Expenditures – the sum total of direct expenditures and indirect expenditures.
Total Employment – the sum total of direct employment and indirect employment.
Total Earnings – the sum total of direct earnings and indirect earnings.
Total Value-Added – the sum total of contribution to Gross Domestic Product.

Source: Econsult Solutions, Inc. (2013)

B.4 Sources

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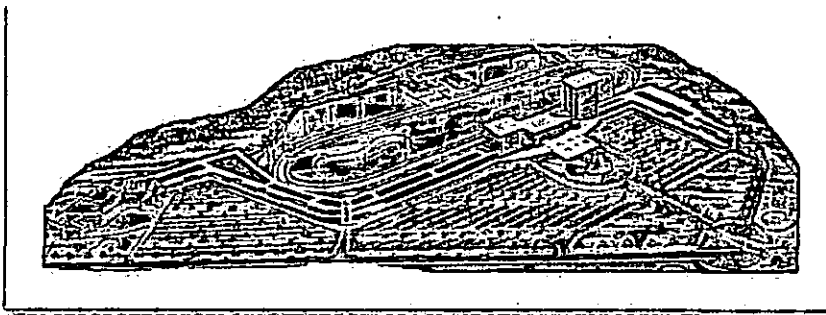


Pennoni

LAWRENCE DOWNS CASINO AND RACETRACK TRAFFIC IMPACT ASSESSMENT

Mahoning Township

Lawrence County,
Pennsylvania



March 2013
ACPC 1301

Prepared For:

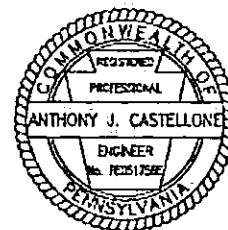
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REFERENCES

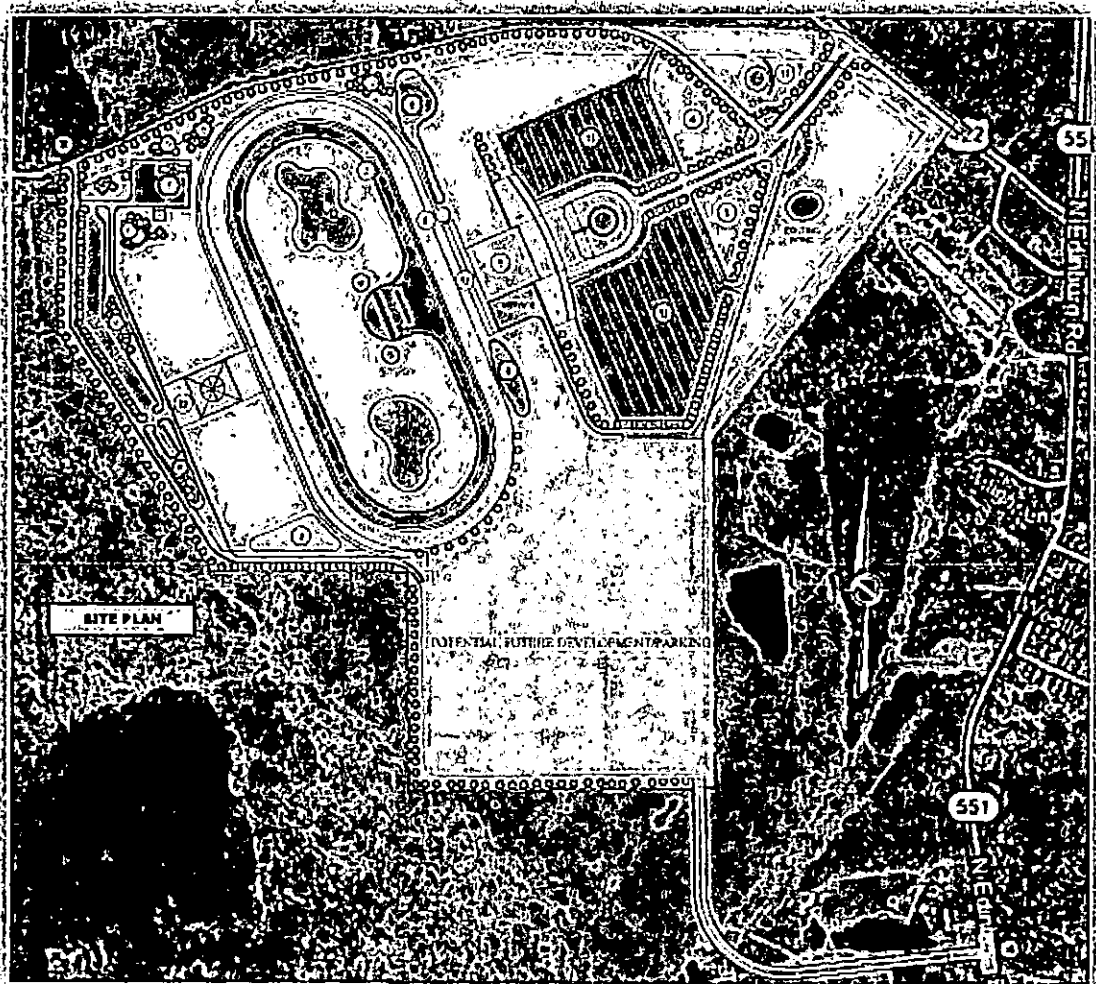
EXECUTIVE SUMMARY

Endeka has is proposing to construct a casino and horse racetrack (Lawrence Downs Casino and Racetrack) in Mahoning Township, Lawrence County, PA. The site is located on the south side of Benjamin Franklin Highway (SR 0422), between Baird Road (T-505) and North Edinburg Road (SR 0551). The Lawrence Downs Casino and Racetrack is planned to open late spring 2015 and is anticipated to consist of:

- 1,250 slot machines,
- 41 table games,
- Horse Racetrack, Grandstand, Stables and Paddocks,
- Food/beverage and entertainment venues, and
- Parking for approximately 2,000 vehicles.

Figure ES-1 shows the conceptual site plan layout.

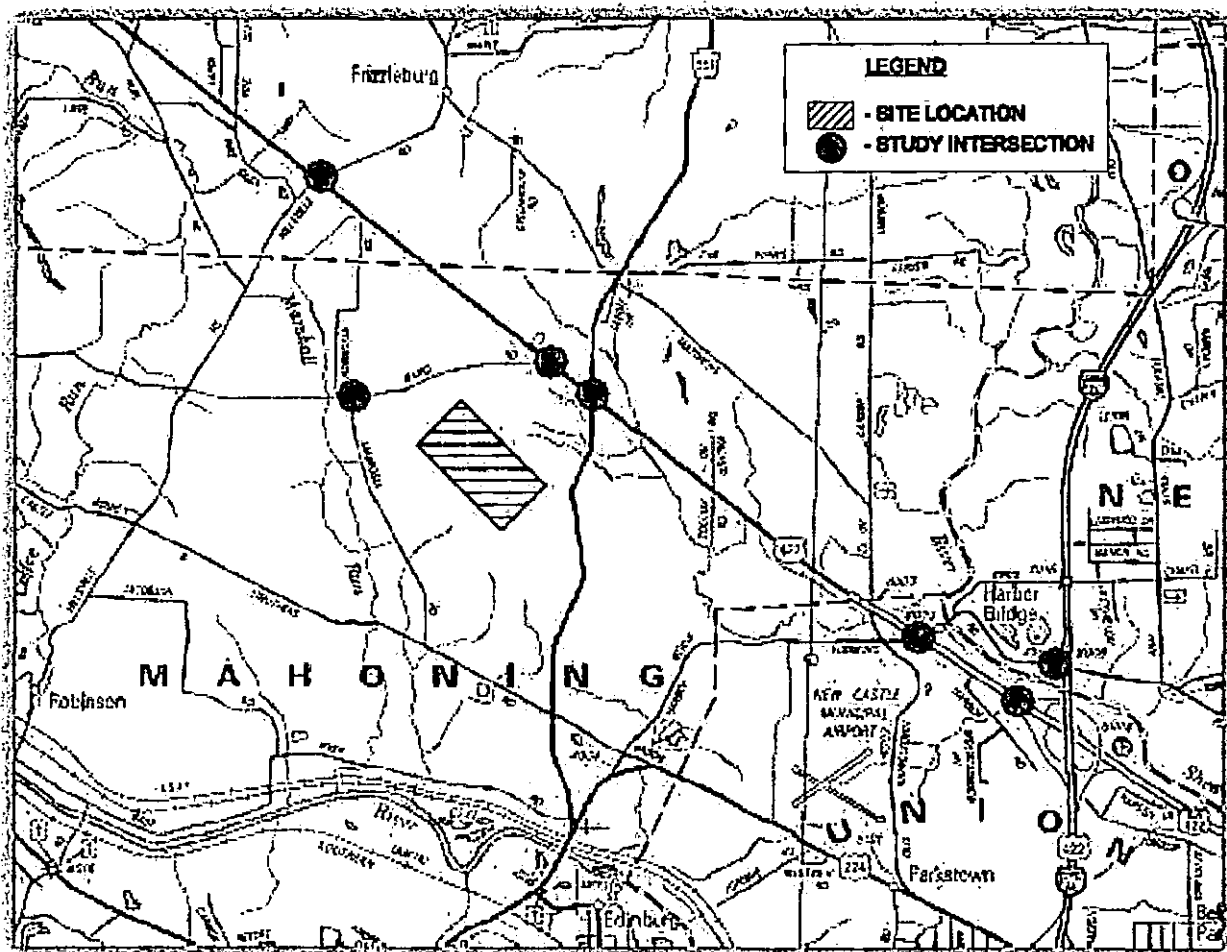
Figure ES-1. Site Plan



Access to Lawrence Downs Casino and Racetrack will be provided via two main access drives. The primary access will be from US Route 422 (Benjamin Franklin Highway). Baird Road is proposed to be realigned to tie into the site access approximately 500 feet south of the existing intersection with US Route 422. The site access will then intersect US Route 422 at the location of the existing Baird Road intersection. A secondary site access is proposed from North Edinburg Road (SR 0551).

FIGURE ES-2 shows the primary study area for this proposed casino and racetrack in Lawrence County, PA.

Figure ES-2. Study Area



FINDINGS AND RECOMMENDATIONS

Findings

The following findings were developed through the analyses associated with this Traffic Impact Assessment:

- Development trips will be comprised of two main components: the Casino (with 1496 gaming positions) and Racetrack (with 1260 grandstand seats). The site is expected to generate 588 Friday peak hour trips and 763 Saturday peak hour trips.
- All study intersections currently operate at overall intersection LOS C or better during both the Friday and Saturday peak hours and will continue to operate at LOS C or better under 2020 No Build conditions. This LOS is consistent with acceptable LOS for rural intersections.
- Reviewed crash data indicates a total of 113 crashes occurred within the study area during the latest 5 year study period, including four (4) fatalities. A cluster of 8 crashes occurred at the intersection of Route 422 and SR 551. A cluster of 12 crashes occurred at the intersection of Route 422 and SR 4004.
- The proposed site access intersection with Route 422 will operate at an overall intersection LOS F with no improvements under 2020 build conditions.
- All other study intersections will continue to operate at overall LOS C or better under 2020 build conditions. None of these intersections will experience overall intersection delay increases greater than 10 seconds.
- A peak hour traffic volume signal warrant is satisfied at the intersection of Route 422 and the main site access under 2020 build conditions. A signal would likely be warranted based on traffic volumes upon the opening of the proposed site.

Recommendations

The following recommendations should be considered upon the development of the Lawrence Downs Casino and Racetrack site:

- Reconstruct the Baird Road intersection with Route 422 such that Baird Road will intersect the new site access drive approximately 500 feet south of Route 422. Align the new site access such that it ties into Route 422 at a 90 degree angle.
- Widen Route 422 to provide a westbound left turn lane at the site entrance with 275 feet of storage, and an eastbound right turn lane at the site entrance with 375 feet of storage.
- Provide for two left turn lanes and a right turn lane configuration on the site access drive approach to Route 422.
- Install a traffic signal at the intersection of Route 422 and the site access drive. Provide a protected / permitted left turn phase for the westbound left turn movement into the site.

In conclusion, if those recommendations suggested above are implemented as part of the Lawrence Downs Casino and Racetrack project, there will be nominal impacts on the surrounding transportation system.

INTRODUCTION

Endeka is proposing to construct a casino and horse racetrack, Lawrence Downs Casino and Racetrack (Casino), in Mahoning Township, Lawrence County, Pennsylvania. The site is located on the south side of Benjamin Franklin Highway (SR 0422), between Baird Road (T-505) and North Edinburg Road (SR 0551). The Lawrence Downs Casino and Racetrack is planned to open late spring 2015 and is anticipated to consist of:

- 1,250 slot machines,
- 41 table games,
- Horse Racetrack, Grandstand, Stables and Paddocks,
- Food/beverage and entertainment venues, and
- Parking for approximately 2,000 vehicles.

Access to Lawrence Downs Casino and Racetrack will be provided via two main access drives. The primary access will be from US Route 422 (Benjamin Franklin Highway). Baird Road is proposed to be realigned to tie into the site access approximately 500 feet south of the existing intersection with US Route 422. The site access will then intersect US Route 422 at the location of the existing Baird Road intersection. A secondary site access is proposed from North Edinburg Road (SR 0551).

This Transportation Impact Assessment (TIA) addresses the anticipated impact of the proposed Casino complex along the adjacent roadway system and recommends potential improvements. The TIA will establish 2013 existing, 2020 "no build" (without casino traffic) and "build" (with casino traffic) conditions. The scope of the TIA was developed to satisfy the requirements of the Pennsylvania Gaming Control Board (PGCB) casino license application requirements.

Based on Pennoni's previous casino-oriented TIS experience, combined with our knowledge of casino traffic operations, we studied the Friday and Saturday afternoon/evening periods, analyzing a combination of street peak and (typical) casino peak hours. While Friday and Saturday evenings are "typical" peak casino patron visitation periods, Friday (late afternoon) and Saturday mid-afternoon periods often have the highest volumes of street traffic. Subsequently, Peak Hour selection is critical to our analyses as the peak hours of adjacent street traffic and Casino peak trip generation do not typically coincide; however, for this rural location, Pennoni analyzed those periods that would likely represent the "busiest" traffic periods of a typical week.

STUDY METHODOLOGY

The analysis contained herein have generally been conducted in accordance with guidelines presented in Pennsylvania Department of Transportation's (PennDOT) *Policies and Procedures for Transportation Impact Studies*, dated January 28, 2009. Two analysis years have been considered for this TIA; existing baseline traffic conditions, and (future) 2020 traffic conditions. The 2020 analyses include an assessment of the operational conditions of the study intersections under "no build" and "build" scenarios. Mitigation is assessed for intersections that experience an overall level of service drop and delay increase of more than ten (10) seconds from the "no build" to "build" conditions. *Level of service* is a measure of operating conditions discussed in detail in Appendix B. Specific elements included in this study are:

- Manual turning movement counts performed at the study intersections during Friday afternoon and Saturday afternoon peak hours;
- Crash analysis of study area intersections based on statistical information received from PennDOT;

- Calculation of vehicular trip generation for the proposed casino complex within the study area based on similar casino/track facilities researched for previous studies associated with this site as well as trip generation rates contained in the Institute of Transportation Engineers (ITE) manual entitled "Trip Generation: An Information Report (9th Edition, 2012).
- Distribution of development-generated traffic onto the study area roadways in accordance with current travel patterns, empirical data obtained from research of similar facilities and previously performed traffic studies for this site.
- Assessment of 2013 and 2020 traffic conditions based on capacity, level of service and queuing analyses performed for the study intersections.
- Auxiliary turn lane warrant analyses.
- Peak Hour Signal Warrant Analysis for the primary site access and Route 422 intersection.

STUDY AREA

FIGURE 1 shows the primary study area for this proposed casino and racetrack in Mahoning Township, Lawrence County, PA. This study area encompasses the following roadways and intersections:

Roadways

US Route 422 (Benjamin Franklin Highway) is a two-way, primary arterial that runs in a general east/west direction, with two westbound lanes and one eastbound lane in the vicinity of the site. There are 8 foot wide paved shoulders in both the eastbound and westbound directions. The speed limit is assumed to be 55mph as there is no posted speed limit in the study area. Traffic volumes range from 4,075 to 5,336 vehicles per day (according to PennDOT iTMS data) along US Route 422 in the study area.

SR 551 (North Edinburg Road) is a two-way, rural major collector that runs in a general north/south direction, with one lane in each direction. There are 2-4 foot wide paved shoulders in both the northbound and southbound directions. The posted speed limit is 45 mph. SR 551 carries a traffic volume of 1,025 vehicles per day (according to PennDOT iTMS data) in the vicinity of the site.

SR 4004 (Harbor Bridge – Edinburg Road) is a two-way, rural major collector that runs in a general north/south direction, with one lane in each direction. There are 2-4 foot wide paved shoulders in both the northbound and southbound directions. The ADT north of Route 422 is 6,596 vpd, while the ADT south of Route 422 is 2,499 vehicles per day (according to PennDOT iTMS data).

Hillsville Road is a two-way, rural, Township roadway that runs in the general north/south direction, with a single lane in each direction and no marked shoulders. The posted speed limit is 40 mph.

Baird Road is a two-way, rural, Township roadway that runs in the general north/south direction, with a single lane in each direction and no marked shoulders. The posted speed limit is 35 mph.

Intersections

US Route 422 and SR 4004 is a signalized intersection. The traffic signal operates with a protected/prohibited left turn phase on Route 422. The Route 422 approaches consist of two through lanes with shared rights and separate left turn lanes. The southbound SR 4004 approach consists of a single lane with a channelized right turn. The northbound SR 4004 approach is a single lane approach.

US Route 422 and SR 551 is an unsignalized intersection. The SR 551 approaches are STOP controlled. There is an existing flasher signal which provides a yellow flashing operation on Route 422 and a red flashing operation on SR 551. The northbound and southbound approaches of SR 551 are single lane approaches with channelized right turn lanes. The Route 422 approaches have separate left turn lanes and shared through/right lanes.

US Route 422 and Baird Road is an unsignalized intersection. The Baird Road approach is STOP controlled. The northbound approach of Baird road is a single lane approach. The eastbound approach of Route 422 is a single lane approach with a channelized right turn movement. The westbound approach of Route 422 consists of two through lanes, with the leftmost lane being a shared left/through lane.

US Route 422 and Hillsville Road is an unsignalized intersection. The Hillsville Road approaches are STOP controlled. The northbound and southbound approaches of Hillsville Road are single lane approaches. The eastbound and westbound approaches of Route 422 consist of separate left turn lanes and a shared through/right lane.

SR 60 Southbound Off-Ramp and Harbor Bridge-Edinburg Road is an unsignalized intersection. The SR 60 off-ramp is STOP controlled. All approaches are single lane approaches.

FIGURE 2 shows the existing intersection lane geometry and traffic control.

EXISTING TRAFFIC CONDITIONS

Data Collection

Turning movement counts, including heavy vehicles and buses, pedestrians and bicycles were conducted on a Friday (February 22, 2013 with schools in session) from 4:00 PM – 8:00 PM and on Saturday (February 23, 2013) from 4:00 PM - 8:00 PM at the intersection of US Route 422 and Harbor Bridge – Edinburg Road (SR 4004). Data for the remaining intersections was derived using counts collected as part of a TIS completed for the site in 2007 by Michael Baker Jr., Inc. (Baker). A comparative analysis method was used to develop a short-term growth factor to convert 2007 traffic count data to 2013 existing conditions.

A comparison of count data for the aforementioned intersection determined that between 2007 and 2013, traffic volumes increased approximately 40% on Friday afternoon, while Saturday afternoon traffic increases were essentially "flat". A call to Mahoning Township indicated that no significant developments have occurred within the area since a Wal-Mart was built approximately 10 years ago. Since the Saturday 2013 count volumes were comparable to those counted by Baker in 2007, it is our professional opinion that either a seasonal and/or non-recurring event caused the count volume differentials at the SR 422/Harbor Bridge-Edinburg Rd intersection. To be conservative for this study, Pennoni traffic engineers projected Baker's 2007 Friday PM traffic counts for all other study intersections by approximately 40% to emulate 2013 volumes at other study intersections; while maintaining a "flat growth" projection for those same intersections for a typical 2013 Saturday.

Study periods were chosen to coincide with peak traffic periods on the adjacent roadway network (typically 4:00 PM to 6:00 PM) on a typical weekday. For this Casino location, the peak hours of trip generation for a casino complex during the weekends are anticipated to occur between the hours of 4:00 PM and 8:00 PM on Friday and Saturday evenings.

The existing turning movement traffic volumes for the intersections within the study area are illustrated on **FIGURE 3**. Copies of the manual traffic count data are provided in **APPENDIX A**. A copy of the referenced information from the *Valley View Downs TIS* is included in **REFERENCES**.

Existing Levels of Service/Queue Analysis

The performance of the study intersections under existing conditions was evaluated through a qualitative measure of operating conditions called Levels of Service. Six levels of Service (LOS) are defined with letter designations from 'A' to 'F'. Level of Service 'C' or better is considered acceptable, with a threshold of Level of Service 'D' in urban areas. Levels of Service are determined through analysis procedures outlined in the 2010 *Highway Capacity Manual* (Transportation Research Board, Washington, D.C.). Level of Service Criteria is provided in **APPENDIX B**.

Levels of Service for signalized intersections are based on average delay experienced by motorists passing the intersection. The delay is based on the results of the capacity analysis (rate of demand flow to capacity) and other important variables such as quality of progression, cycle length, and ratio of green time. Field observations were conducted to verify the existing traffic signal, phasing, cycle lengths, green times and clearance intervals. The field verified timings were utilized to evaluate the operation of signalized intersections. A copy of the existing traffic signal permit plan for Route 422 and SR 4004 was obtained from PennDOT, and is provided in **APPENDIX C**.

The operational analyses of the study intersections under all conditions were performed using *Synchro* (Version 8.0, build 803) software. All study intersections currently operate at overall LOS C or better. A summary of existing conditions levels of service data and the 95th percentile queue lengths of all the study intersections are provided in **TABLE 1**. Detailed outputs of the 2013 "Existing" conditions analyses are provided in **APPENDIX D**.

TABLE 1: LEVEL OF SERVICE SUMMARY – EXISTING 2013

Intersection		FRIDAY, PM PEAK HOUR			SATURDAY, PM PEAK HOUR			Storage Capacity (Feet)
		Delay (Secs)	LOS	95th % (Feet)	Delay (Secs)	LOS	95th % (Feet)	
US Route 422 & SR 4004 (SIGNALIZED)	Overall Intersection	19.0	B	-	15.8	B	-	-
	EB Left	31.4	C	63	23.4	C	28	200
	EB Thru	18.4	B	60	14.8	B	28	-
	WB Left	36.3	D	10	38.2	D	10	325
	WB Thru	21.4	C	53	16.5	B	28	-
	NB Left/Thru/Right	12.6	B	63	13.1	B	43	-
	SB Left/Thru	17.4	B	200	14.9	B	98	-
US Route 422 & SR 0551	Overall Intersection	4.9	A	-	3.1	A	-	-
	EB Left	8.0	A	0	7.8	A	0	180
	EB Thru/Right	-	-	-	-	-	-	-
	WB Left	8.1	A	3	7.7	A	0	175
	WB Thru/Right	-	-	-	-	-	-	-
	NB Left/Thru/Right	21.3	C	33	12.4	B	8	-
	SB Left/Thru/Right	21.7	C	38	14.0	B	13	-
US Route 422 & Hillsville Road	Overall Intersection	2.5	A	-	2.3	A	-	-
	EB Left	8.0	A	0	7.7	A	0	230
	EB Thru/Right	-	-	-	-	-	-	-
	WB Left	7.8	A	0	7.6	A	0	180
	WB Thru/Right	-	-	-	-	-	-	-
	NB Left/Thru/Right	13.7	B	5	12.2	B	3	-
	SB Left/Thru/Right	15.2	C	18	12.0	B	10	-
US Route 422 & Baird Road	Overall Intersection	0.5	A	-	0.6	A	-	-
	EB Thru/Right	-	-	-	-	-	-	-
	WB Thru/Left	8.0	A	0	7.6	A	0	-
	WB Thru	0.1	A	0	-	-	-	-
	NB Left	10.3	B	3	9.4	A	3	-
	NB Right	-	-	-	-	-	-	-
Baird Road & Ambrosia Road	Overall Intersection	3.3	A	-	2.5	A	-	-
	EB Thru/Right	-	-	-	-	-	-	-
	WB Left/Thru	2.1	A	0	0.8	A	0	-
	NB Left/Right	8.9	A	3	8.6	A	0	-
SR 4004 & SR 0060 SB OFF	Overall Intersection	1.0	A	-	-	-	-	-
	EB Thru	-	-	-	-	-	-	-
	WB Thru	-	-	-	-	-	-	-
	SB Left/Right	13.4	B	13	11.0	B	8	-

Crash Analysis

Crash histories, engineering extracts summaries and resume pages for the study area were obtained from PennDOT's Bureau of Highway Safety and Traffic Engineering. Crash data was obtained for the latest 5 year period available (January 1, 2007 through December 31, 2011) for the following roadway segments/offsets:

- SR 0422 from 0060/0000 to 0194/1400
- SR 0551 from 0240/0000 to 0260/0300
- SR 4004 from 0040/2000 to 0060/0300

Review of the crash data indicates that a total of 113 crashes occurred on the roadway limits above during the 5 year study period. A cluster of 8 crashes occurred at the intersection of Route 422 and SR 551. A cluster of 12 crashes occurred at the intersection of Route 422 and SR 4004. Specific crash causes and types are summarized below:

- 14 snow/ice related crashes
- 12 crashes involved deer
- 4 fatal crashes
- 8 major injury crashes

All fatal crashes occurred on Route 422 or at intersections with Route 422. One of the fatal crashes was snow/ice related, one was alcohol related, and two were angle crashes caused by vehicles turning without clearance from side streets onto Route 422.

Pursuant to 75 PA Code Section 3754, the crash history provided by PennDOT is confidential, and publication, reproduction, release or discussion of these materials is expressly prohibited without the specific written consent of PennDOT. Since this TIA will become public record the crash data has not been included in the TIA. Consequently, we cannot release the crash analysis which has been performed using the crash data from PennDOT, as this would constitute a discussion of the materials. The PennDOT log number can be provided should interested parties wish to request data from PennDOT.

FUTURE NO BUILD TRAFFIC CONDITIONS

Programmed Roadway Improvements

Based on correspondence with PennDOT there are no Programmed Roadway Improvements projects or committed developments within the study area which would impact the analyses at study area intersections.

No Build Traffic Volumes

In order to account for general traffic growth in the area, an annual background growth rate is typically applied to existing traffic volumes on the study area roadways. An annual background growth rate of 0.5% per year has been established by PennDOT's *Bureau of Planning and Research* for rural, non-interstate roadways in Lawrence County. Traffic volumes associated with specific developments in the study area are typically added to the background traffic in developing the future "no build" volumes. Since there are no committed developments within the study area, future "no build" volumes were developed by applying the 0.5% annual growth rate to 2013 traffic volumes. A copy of the documentation on annual growth rates is provided in APPENDIX E.

The 2020 No Build peak hour traffic volumes are illustrated in FIGURE 4.

No Build Levels of Service/Queue Analysis

Operations of the study intersections during the peak hours were evaluated for the 2020 No Build traffic scenario. All study intersections are projected to operate at overall LOS C or better during both Friday and Saturday peak hours. TABLE 2 provides a summary of the results of the No Build analysis. Detailed outputs of the 2020 "No Build" conditions analyses are provided in APPENDIX F.

TABLE 2: LEVEL OF SERVICE SUMMARY – 2020 NO BUILD

Intersection	FRIDAY PM PEAK HOUR			SATURDAY PM PEAK HOUR			Storage Capacity (Feet)
	Delay (Secs)	LOS	95th % (Feet)	Delay (Secs)	LOS	95th % (Feet)	
US Route 422 & SR 4004 (SIGNALIZED)	Overall Intersection	20.4	C	-	15.8	B	-
	EB Left	34.3	C	70	22.5	C	200
	EB Thru	19.1	B	70	14.6	B	28
	WB Left	39.3	D	10	37.4	D	8
	WB Thru	22.2	C	60	16.4	B	28
	NB Left/Thru/Right	13.2	B	75	13.1	B	43
	SB Left/Thru	19.6	B	233	15.2	B	98
US Route 422 & SR 0551	Overall Intersection	5.3	A	-	3.1	A	-
	EB Left	8.0	A	0	7.8	A	0
	EB Thru/Right	-	-	-	-	-	-
	WB Left	8.2	A	3	7.8	A	0
	WB Thru/Right	-	-	-	-	-	-
	NB Left/Thru/Right	23.2	C	35	12.8	B	8
	SB Left/Thru/Right	23.6	C	43	14.3	B	15
US Route 422 & Hillsville Road	Overall Intersection	2.6	A	-	2.2	A	-
	EB Left	8.0	A	0	7.8	A	0.0
	EB Thru/Right	-	-	-	-	-	-
	WB Left	7.8	A	0	7.6	A	0
	WB Thru/Right	-	-	-	-	-	-
	NB Left/Thru/Right	13.8	B	5	12.3	B	3
	SB Left/Thru/Right	15.6	C	18	12.2	B	10
US Route 422 & Baird Road	Overall Intersection	0.5	A	-	0.5	A	-
	EB Thru/Right	-	-	-	-	-	-
	WB Left/Thru	8.1	A	0	7.7	A	0
	WB Thru	0.1	A	0	-	-	-
	NB Left	10.4	B	3	9.4	A	3
	NB Right	-	-	-	-	-	-
Baird Road & Ambrosia Road	Overall Intersection	3.1	A	-	2.5	A	-
	EB Thru/Right	-	-	-	-	-	-
	WB Left/Thru	2.1	A	0	0.8	A	0
	NB Left/Right	8.9	A	3	8.6	A	0
SR 4004 & SR 0060 SB OFF	Overall Intersection	1.0	A	-	1.2	A	-
	EB Thru	-	-	-	-	-	-
	WB Thru	-	-	-	-	-	-
	SB Left/Right	13.7	B	13	11.1	B	8

FUTURE BUILD TRAFFIC CONDITIONS

Access to Lawrence Downs Casino and Racetrack will be provided via two (2) access drives. The primary access will be from US Route 422 (Benjamin Franklin Highway). The site access will then intersect US Route 422 at the location of the existing Baird Road intersection. A secondary site access is proposed from North Edinburg Road (SR 0551). It is anticipated that this access drive will primarily be utilized by Casino employees and delivery vehicles.

Trip Generation

Development trips were generated for the site based on two main "destination" components: the Casino (with 1496 gaming positions) and the horse racetrack (with 1260 grandstand seats). The number of gaming positions for the Casino is broken down as follows:

- 1250 slot machines
- 41 table games (6 seats/table) = 246 gaming positions
- **Total Gaming Positions = 1496**

Projected peak hour trips (per gaming position) for the casino's Friday and Saturday evening peak periods are based on the trip generation rates developed in the original Traffic Impact Study for the site. The TIS for the site (previously known as Valley View Downs Racetrack and Casino) documented actual vehicle trips generated by a similar facility; i.e., "The Meadows Casino & Racetrack" located in Washington, PA, approximately 75 miles south of the proposed Lawrence Downs Casino & Racetrack (See **REFERENCES**). Project peak hour trips for the horse racetrack were developed using ITE's Trip Generation (9th Edition).

TABLE 3 summarizes the anticipated peak hour trips to/from the proposed casino during the Friday PM and Saturday PM peaks.

TABLE 3: SITE TRIP GENERATION

LAND USE DESCRIPTION	TRIP GENERATION					
	FRIDAY PM PEAK			SATURDAY PM PEAK		
	IN	OUT	TOTAL	IN	OUT	TOTAL
Casino (1496 Gaming Positions)	292	220	512	357	330	687
ITE Land Use #452 Horse Racetrack with 1260 Seats	50	26	76	50	26	76
<i>Total Trips</i>	342	246	588	407	356	763

* Friday trip rate = 0.342 trips/gaming position
Saturday trip rate = 0.459 trips/gaming position

Trip Distribution and Assignment

The new vehicle trips generated by the site development were distributed and assigned to the roadway network based on a review of existing count data, regional traffic routes, and existing travel patterns determined from previous traffic studies. Baird Road is should be realigned to tie into the site access approximately 500 feet south of the existing intersection with US Route 422 to consolidate future traffic at this proposed main

access drive. Detailed traffic distribution percentages and volumes for the proposed development are illustrated in FIGURE 5. A generalized summary of the anticipated distribution of site traffic is shown in TABLE 4.

TABLE 4: DISTRIBUTION OF SITE TRAFFIC

Route	Percentage Distribution
From the East on Route 422	1.0%
From the South on SR 60	23.0%
From the North on SR 60	8.0%
From the East on Pulaski Road	0.5%
From the North on SR 551	0.5%
From the West on Route 422	66.0%
From the South on SR 551	1.0%

Build Traffic Volumes

The traffic volumes generated by the proposed site were added to the 2020 No Build traffic volumes to develop the 2020 Build traffic volumes. These traffic volumes are illustrated on FIGURE 8.

Build Levels of Service/Queue Analysis

Operations of the study intersections during the peak hours were evaluated for the 2020 Build traffic scenario. All study intersections are projected to continue to operate at an overall LOS C or better during both Friday and Saturday peak hours except the existing unsignalized intersection of Route 422 & Baird Road/ Proposed Site Entrance. With no improvements, the unsignalized intersection would operate at an overall LOS F during the Saturday peak hour with a volume/capacity ratio of over 2.5 on the STOP controlled approach to Route 422. TABLE 5 provides a summary of the results of the Build analysis. Detailed outputs of the 2020 "Build" conditions analyses are provided in APPENDIX G.

TABLE 5: LEVEL OF SERVICE SUMMARY - 2020 BUILD CONDITIONS

Intersection	FRIDAY PM PEAK HOUR			SATURDAY PM PEAK HOUR			Storage Capacity (Feet)
	Delay (Secs)	LOS	95th % (Feet)	Delay (Secs)	LOS	95th % (Feet)	
US Route 422 & SR 4004 (SIGNALIZED)	Overall Intersection	20.4	C	-	16.3	B	-
	EB Left	34.7	C	73	23.3	C	200
	EB Thru	19.7	B	93	15.1	B	53
	WB Left	38.6	D	10	38.2	D	10
	WB Thru	23.3	C	83	16.9	B	48
	NB Left/Thru/Right	13.0	B	73	13.8	B	48
	SB Left/Thru	18.2	B	218	16.0	B	105
US Route 422 & SR 0551	Overall Intersection	7.5	A	-	3.0	A	-
	EB Left	8.4	A	0	8.2	A	3.0
	EB Thru/Right	-	-	-	-	-	-
	WB Left	8.5	A	3	8.2	A	3
	WB Thru/Right	-	-	-	-	-	-
	NB Left/Thru/Right	42.9	E	68	24.7	C	15
US Route 422 & Hillsville Road	Overall Intersection	2.9	A	-	2.0	A	-
	EB Left	8.5	A	0	8.5	A	3
	EB Thru/Right	-	-	-	-	-	-
	WB Left	8.5	A	3	8.4	A	3
	WB Thru/Right	-	-	-	-	-	-
	NB Left/Thru/Right	22.7	C	10	19.7	C	15
US Route 422 & Site Access/Baird Road	Overall Intersection	28.1	D	-	406.0	F	-
	EB Thru/Right	-	-	-	-	-	-
	WB Left/Thru	9.5	A	13	9.2	A	13
	WB Thru	0.5	A	0	0.3	A	0
	NB Left	124.2	F	330	789.1	F	2030
	NB Right	-	-	-	-	-	-
Baird Road & Ambrosia Road	Overall Intersection	3.1	A	-	2.5	A	-
	EB Thru/Right	-	-	-	-	-	-
	WB Left/Thru	2.1	A	0	0.8	A	0
	NB Left/Right	8.9	A	3	8.6	A	0
SR 4004 & SR 0060 SB OFF	Overall Intersection	1.4	A	-	2.0	A	-
	EB Thru	-	-	-	-	-	-
	WB Thru	-	-	-	-	-	-
	SB Left/Right	13.8	B	18	11.3	B	15
Baird Road & Site Access	Overall Intersection	0.4	A	-	0.2	A	-
	EB Thru/Right	-	-	-	-	-	-
	WB Left/Thru	-	-	-	-	-	-
	NB Left/Right	13.5	B	3	15.9	C	-
Site Access & SR 0551	Overall Intersection	0.2	A	-	0.6	A	-
	EB Thru/Right	8.8	A	-	8.6	A	-
	WB Left/Thru	-	-	-	-	-	-
	NB Left/Right	7.4	A	-	7.3	A	-

BUILD WITH MITIGATION TRAFFIC CONDITIONS

In order to offset the impact of the proposed site and mitigate any queuing issues, we recommend the following mitigation measures.

- Installation of a traffic signal at Main Site Access and SR 0422 in conjunction with a "high-volume" design in accordance with PennDOT Highway Occupancy Permit design guidelines;
- Installation of a 275 foot westbound left-turn lane along SR 0422 at the Casino's main entrance drive;
- Installation of a 375 foot eastbound right-turn lane along SR 0422 at the Casino's main entrance drive; and

Results of the 2020 Build conditions "with mitigation" analysis are summarized in TABLE 6 below. Detailed outputs of the 2020 "Build w/Mitigation" conditions analyses are provided in APPENDIX H.

TABLE 6: LEVEL OF SERVICE SUMMARY - 2020 BUILD CONDITIONS w/MITIGATION

Intersection	FRIDAY, PM PEAK HOUR			SATURDAY, PM PEAK HOUR			Storage Capacity (Feet)
	Delay (Secs)	LOS	95th % (Feet)	Delay (Secs)	LOS	95th % (Feet)	
US Route 422 & Site Access/Baird Road (SIGNALIZED)	Overall Intersection	10.7	B	-	16.5	B	-
	EB Thru	12.3	B	95	15.0	B	78
	EB Right	12.0	B	75	22.2	C	165
	WB Left	7.6	A	18	10.6	B	38
	WB Thru	4.3	A	18	7.0	A	20
	NB Left	15.8	B	35	16.8	B	138
	NB Right	17.0	B	38	20.0	C	153

TURN LANE WARRANT ANALYSIS

Auxiliary turn lane warrants were analyzed at both the primary site access and Route 422 intersection, and the secondary site access and SR 551 intersection according to the procedures outlined in PennDOT's Pub 46, Traffic Engineering Manual. Based on these analyses, an eastbound right turn lane should be provided on Route 422 at the site access as well as a westbound left turn lane. The secondary site access on SR 551 does not meet warrant for left or right turn lanes. The turn lane warrant analysis worksheets are included in APPENDIX J.

SIGNAL WARRANT ANALYSIS

Peak hour signal warrant analyses were performed at the intersection of Route 422 with the proposed main site access under 2020 build conditions to evaluate whether a traffic signal will be warranted with additional traffic from the propose site. Based on the projected traffic volumes the peak hour traffic signal warrant will be satisfied under future 2020 build conditions. It should also be noted that without traffic signal control, the site access approach to Route 422 is projected to operate at a LOS F with significant vehicle delay and a volume/capacity ratio greater than 2.5 in the Saturday peak. With the installation of a traffic signal and the additional geometric improvements identified above, the intersection is projected to operate at an overall LOS B during both peak hours. See Appendix J for the MUTCD peak hour traffic signal warrant charts and signal design worksheets.

FINDINGS AND RECOMMENDATIONS

Findings

The following findings were developed through the analyses associated with this Traffic Impact Assessment:

- Development trips will be comprised of two main components: the Casino (with 1496 gaming positions) and Racetrack (with 1260 grandstand seats). The site is expected to generate 588 new Friday peak hour trips and 763 new Saturday peak hour trips.
- All study intersections currently operate at overall intersection LOS C or better during both the Friday and Saturday peak hours and will continue to operate at LOS C or better under 2020 No Build conditions. This LOS is consistent with acceptable LOS for rural intersections.
- Reviewed crash data indicates a total of 113 crashes occurred within the study area during the latest 5 year study period, including four (4) fatalities. A cluster of 8 crashes occurred at the intersection of Route 422 and SR 551. A cluster of 12 crashes occurred at the intersection of Route 422 and SR 4004.
- The proposed site access intersection with Route 422 will operate at an overall intersection LOS F with no improvements under 2020 build conditions.
- All other study intersections will continue to operate at overall LOS C or better under 2020 build conditions. None of these intersections will experience overall intersection delay increases greater than 10 seconds.
- Peak hour traffic volume signal warrants are satisfied at the intersection of Route 422 and the main site access under 2020 build conditions. A signal would likely be warranted based on traffic volumes upon the opening of the proposed site.

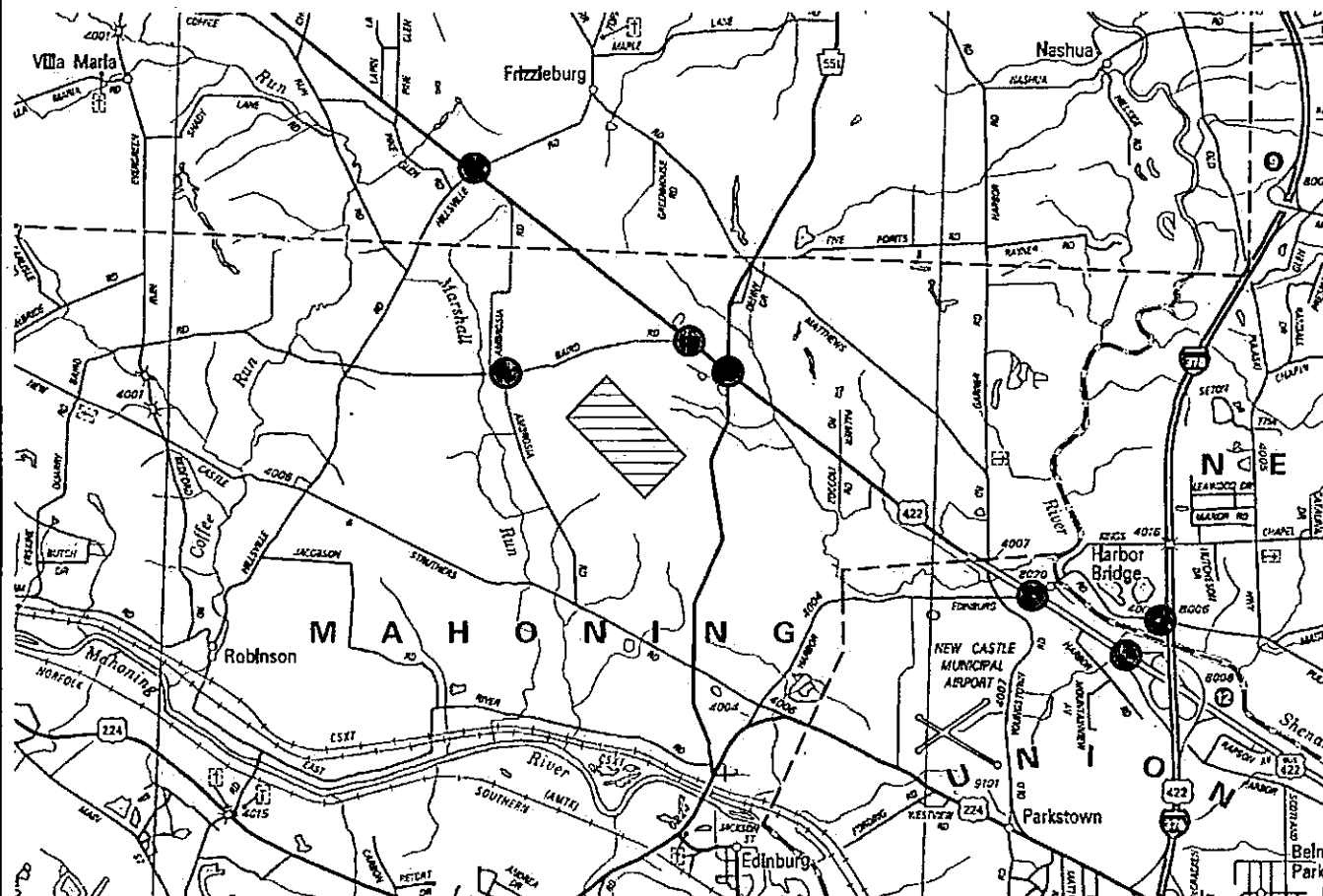
Recommendations

The following recommendations should be considered upon the development of the Lawrence Downs Casino and Racetrack site:

- Reconstruct the Baird Road intersection with Route 422 such that Baird Road will intersect the new site access drive approximately 500 feet south of Route 422. Align the new site access such that it ties into Route 422 at a 90 degree angle.
- Widen Route 422 to provide a westbound left turn lane at the site entrance with 275 feet of storage, and an eastbound right turn lane at the site entrance with 375 feet of storage.
- Provide for two left turn lanes and a right turn lane configuration for the "high volume" site access drive approach to Route 422.
- Install a traffic signal at the intersection of Route 422 and the site access drive. Provide a protected / permitted left turn phase for the westbound left turn movement into the site.

In conclusion, if those recommendations suggested above are implemented as part of the Lawrence Downs Casino and Racetrack project, there will be nominal impacts on the surrounding transportation system.

FIGURES



LEGEND

-  - SITE LOCATION
-  - STUDY INTERSECTION

FIGURE 1: STUDY AREA

PROJECT LOCATION AND STUDY INTERSECTIONS

NOT TO SCALE

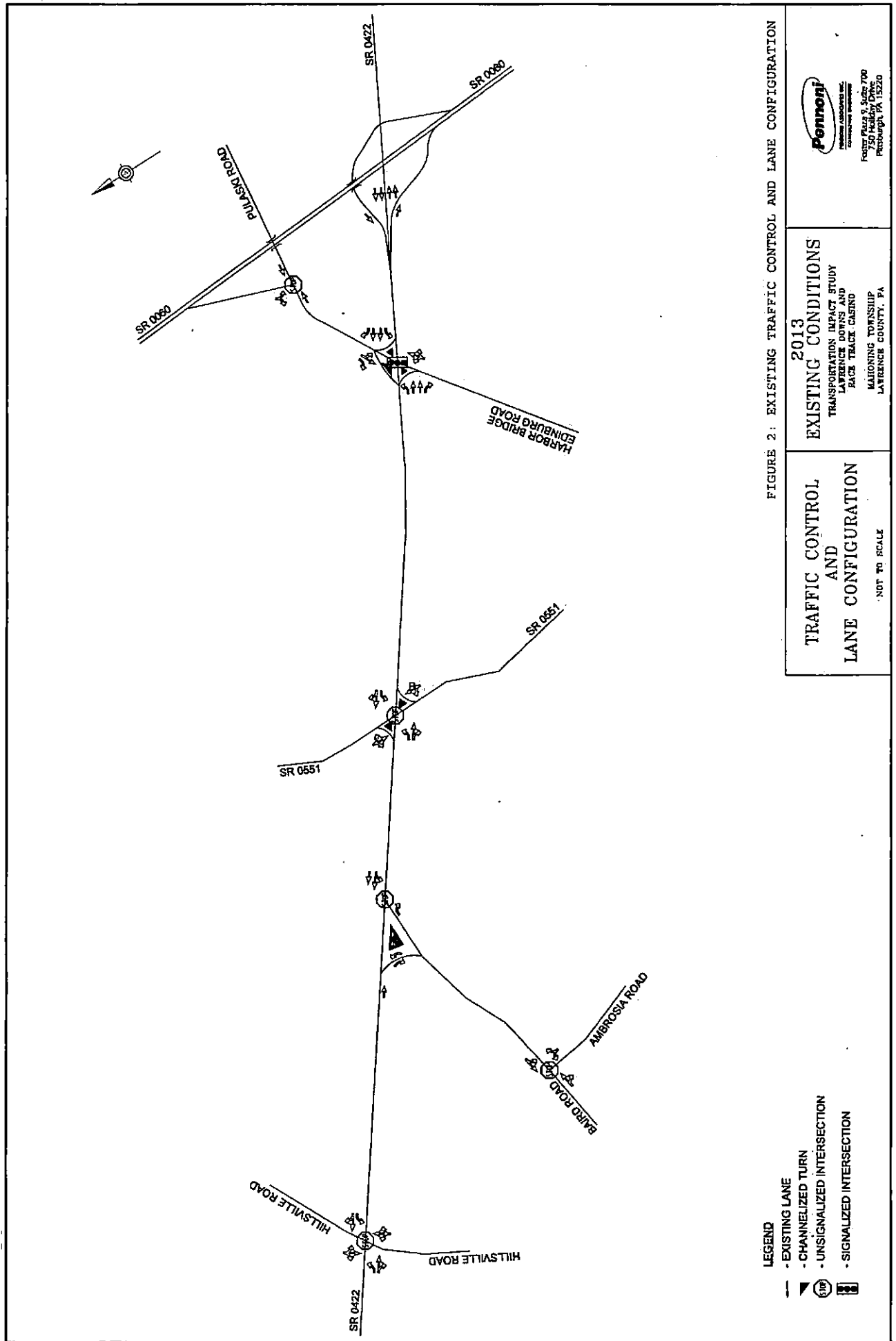
TRANSPORTATION IMPACT STUDY
LAWRENCE DOWNS AND
RACE TRACK CASINO

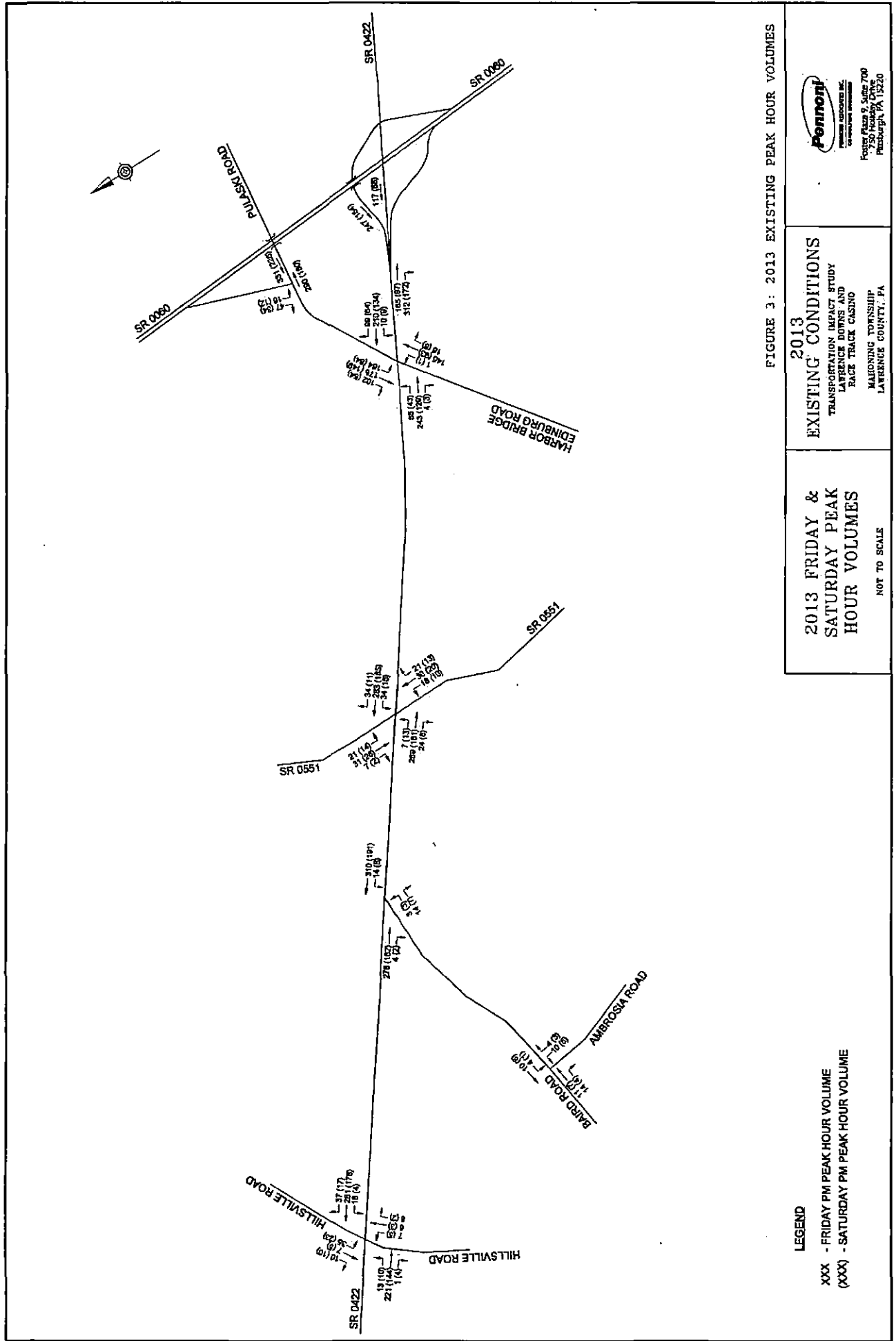
MAHONING TOWNSHIP
LAWRENCE COUNTY, PA

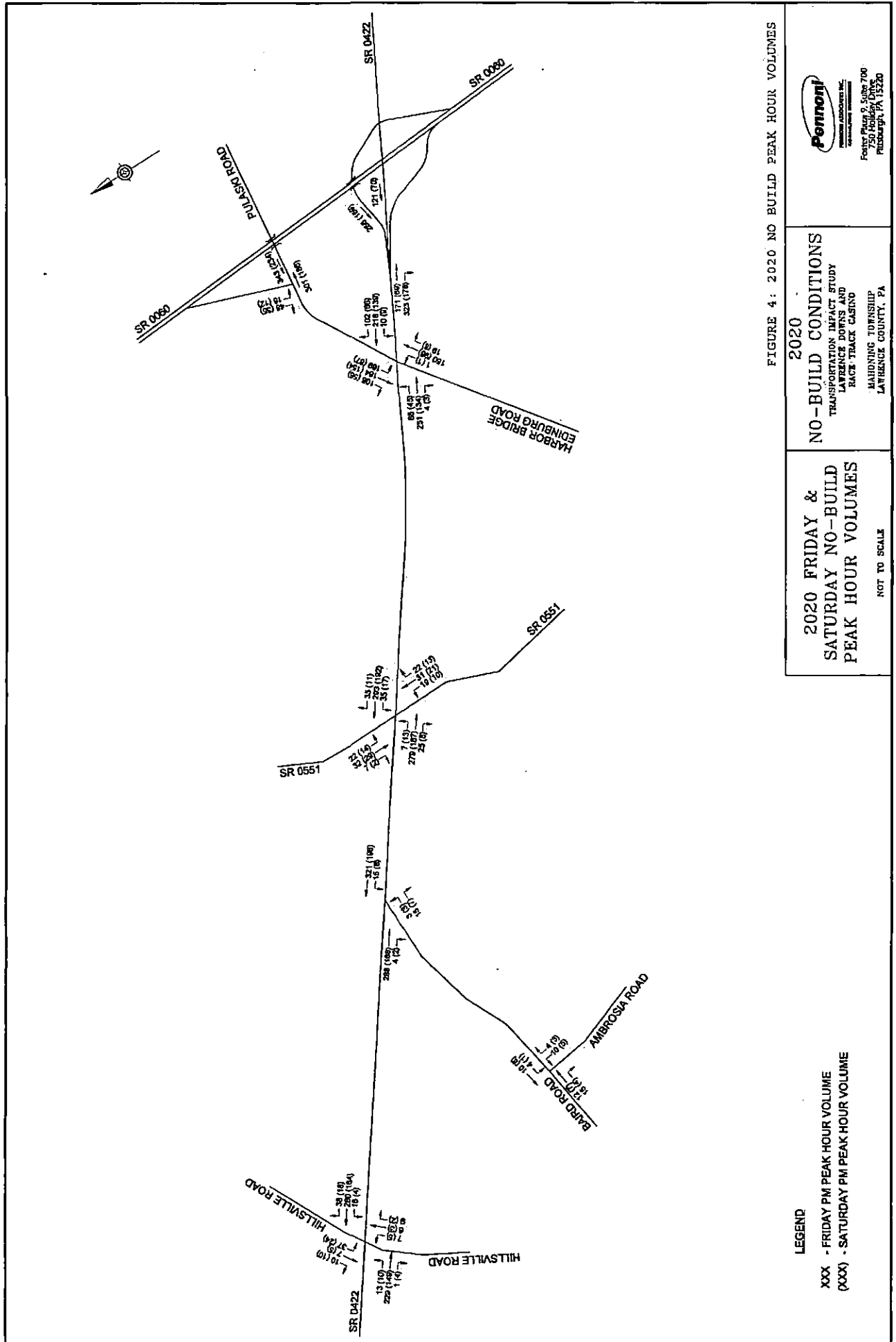
Pennoni

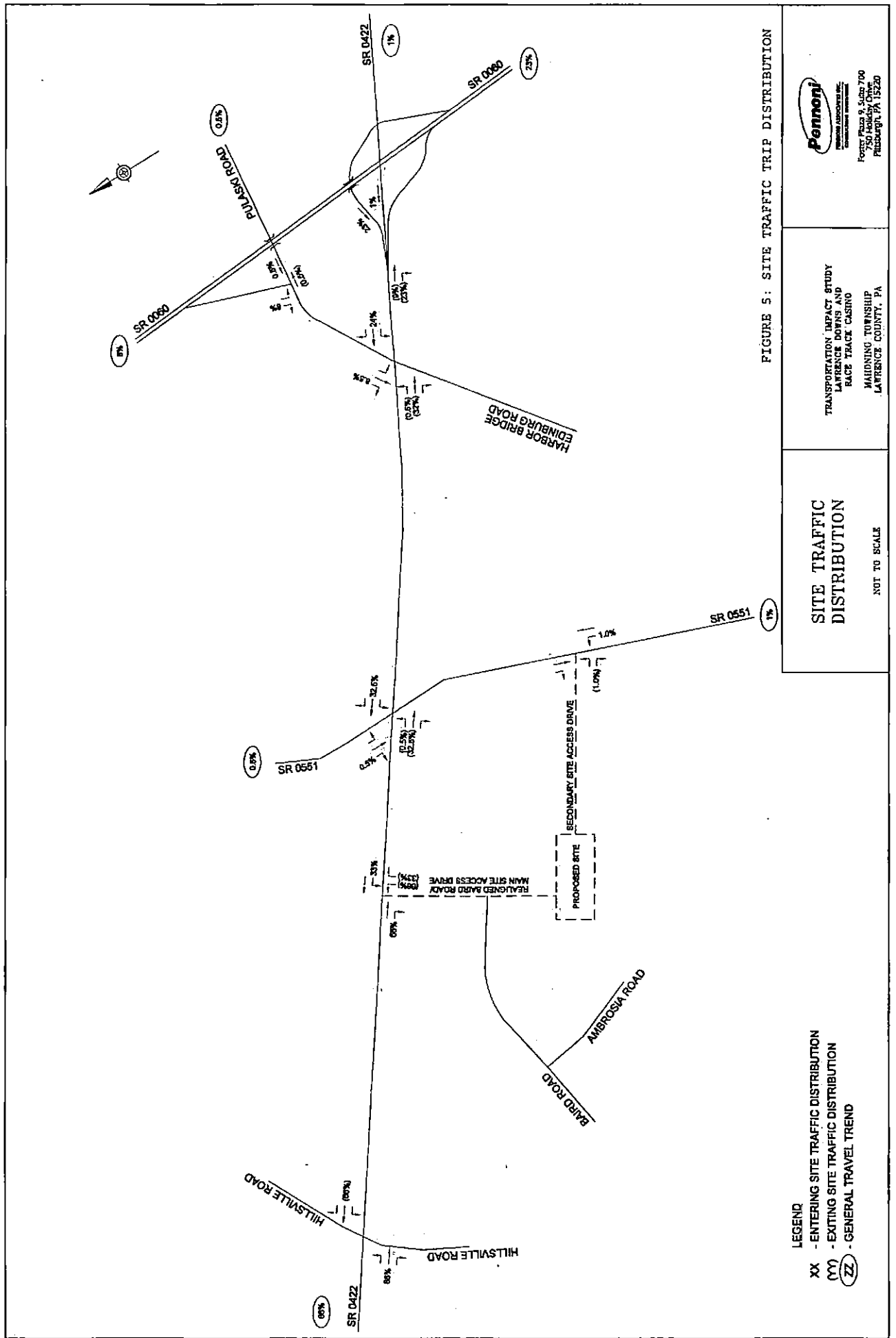
PENNONI ASSOCIATES INC.
CONSULTING ENGINEERS

Foster Plaza 9, Suite 700
750 Holiday Drive
Pittsburgh, PA 15220









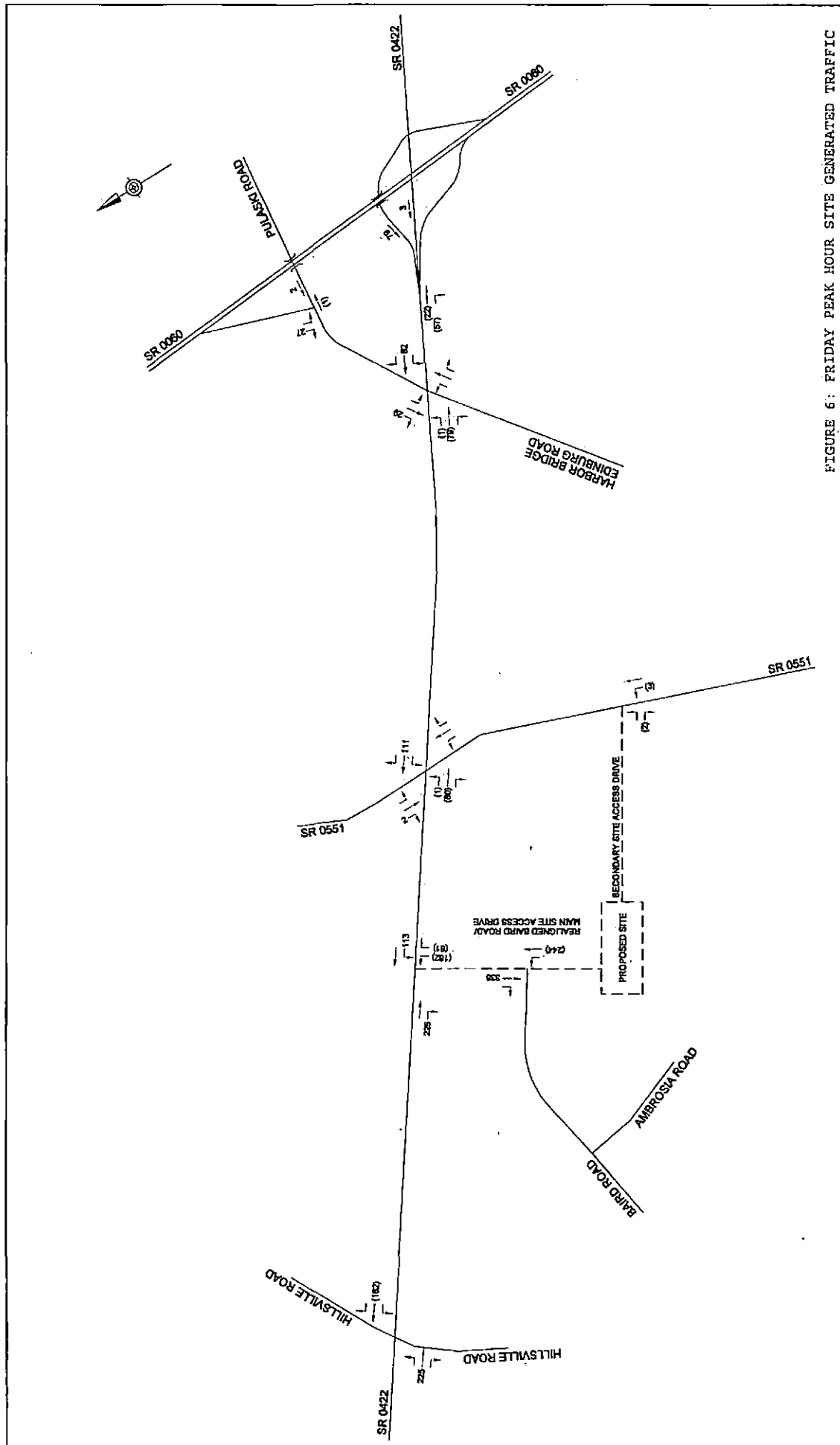


FIGURE 6: FRIDAY PEAK HOUR SITE GENERATED TRAFFIC

**FRIDAY PEAK HOUR
SITE GENERATED
TRAFFIC**

NOT TO SCALE

LEGEND

XX - ENTERING SITE TRAFFIC DISTRIBUTION
(YY) - EXISTING SITE TRAFFIC DISTRIBUTION
(ZZ) - GENERAL TRAVEL TREND



TRANSPORTATION IMPACT STUDY
LAWRENCE TOWNSHIP AND
RACE TRACK CASINO

MAHONING TOWNSHIP
LAWRENCE COUNTY, PA

FOSTER PARR 3, Suite 700
17750 Holiday Drive
Pittsburgh, PA 15220

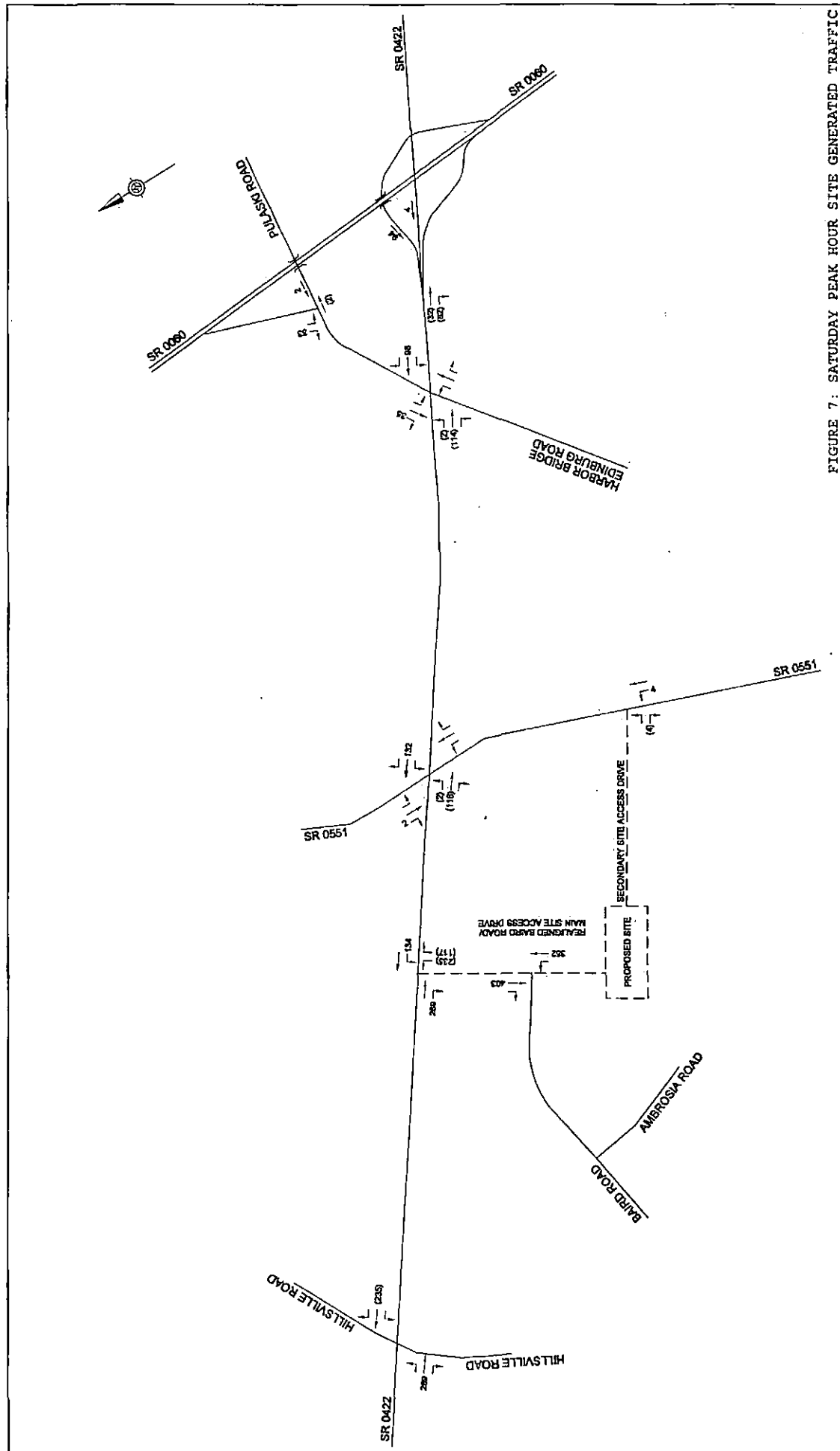


FIGURE 7: SATURDAY PEAK HOUR SITE GENERATED TRAFFIC

<p>Penmont</p> <p>TRANSPORTATION IMPACT STUDY LAWRENCE TOWNSHIP AND MACE TRUCK CENTER MADISON TOWNSHIP LAWRENCE COUNTY, PA</p>	<p>SATURDAY PEAK HOUR SITE GENERATED TRAFFIC</p> <p>NOT TO SCALE</p>	<p>LEGEND</p> <p>XX - ENTERING SITE TRAFFIC DISTRIBUTION YY - EXISTING SITE TRAFFIC DISTRIBUTION ZZ - GENERAL TRAVEL TREND</p>
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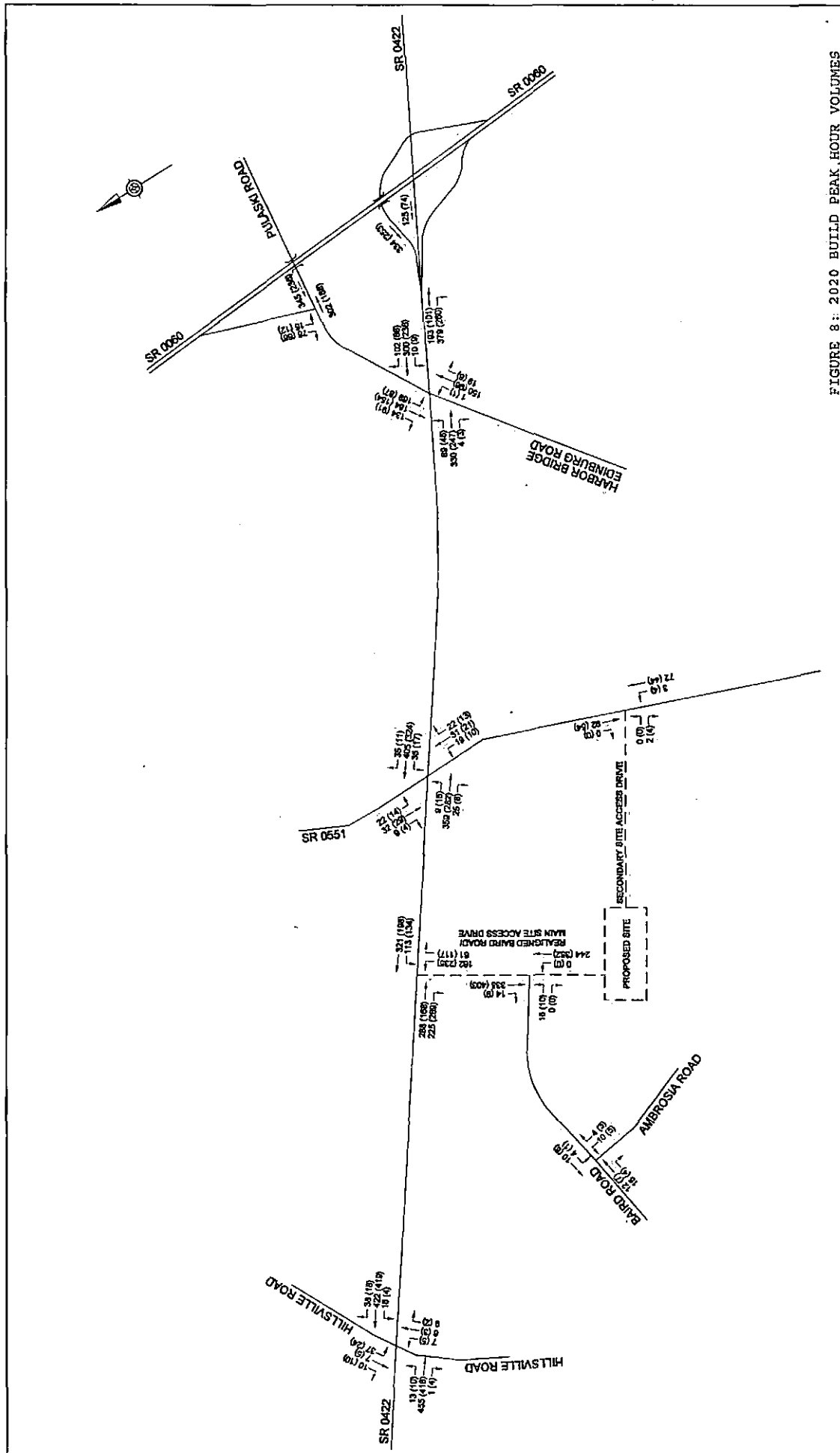


FIGURE 8: 2020 BUILD PEAK HOUR VOLUMES

2020
BUILD CONDITIONS

TRANSPORTATION IMPACT STUDY
LAWRENCE TOWNSHIP AND
RACE TRACK CASINO

2020 FRIDAY &
SATURDAY BUILD
PEAK HOUR VOLUMES

NOT TO SCALE

LEGEND

XXX - FRIDAY PM PEAK HOUR VOLUME
000X - SATURDAY PM PEAK HOUR VOLUME



Pennoni
750 Madison Avenue
Pittsburgh, PA 15220

APPENDIX 35

DETAILS OF LAND ACQUISITION COSTS

Redacted

APPENDIX 36

DETAILS OF COMPULSIVE OR PROBLEM GAMBLING PLAN

Redacted

APPENDIX 37

**DETAILS OF TEMPORARY FACILITY AS WELL AS A PLAN FOR THE
TRANSITION TO A PERMANENT FACILITY, INCLUDING A DATE FOR THE
COMPLETION OF THE PERMANENT FACILITY**

Redacted

APPENDIX 38

APPLICANT'S PLAN FOR SATISFACTION OF THE REQUIREMENTS SET FORTH UNDER 4 PA.C.S §1325.

Endeka Entertainment, LP ("Endeka") is confident and has provided sufficient evidence to confirm its ability to satisfy each of the requirements set forth under 4 Pa.C.S §1325.

1. Location and Quality of the Proposed Facility, including Road and Transit Access, Parking and Centrality to Market Service Area

Please see the "Traffic Impact Assessment" report prepared by Pennoni Associates, Inc. which is set forth in Appendix 32.

2. Potential for New Job Creation and Economic Development

At the request of Endeka Entertainment, LP, Econsult Solutions prepared an "Economic and Fiscal Impacts" report to analyze the impact this project would have on the local community, Lawrence County and the Commonwealth of Pennsylvania. A copy of Econsult Solution's report ("the Report") is attached hereto as Exhibit A to Appendix 34.

The Report concluded that the facility's location is ideally situated in close proximity to both the Greater Pittsburgh area and Youngstown, Ohio. As a result, it is likely to attract visitors from across state lines, resulting in an importation of purchasing power into the Commonwealth for the benefit of Commonwealth employment and Commonwealth tax revenues. The report also found that the total project costs for the casino and racetrack are anticipated to be about \$233 million, which is consistent within the gaming industry for projects of this nature and scale. Of this amount, about \$101 million is considered modelable in terms of its direct impact on the Region.

In summary, Econsult has issued the following projections for the facility proposed by Endeka Entertainment, LP:

- I. A total creation of 1,002-1,847 new direct employment opportunities, along with 876-1,574 new indirect employment positions for Lawrence County.
- II. There will be \$97 million in direct expenditures associated with upfront construction of the facility, which will have a significant impact on the Regional and Commonwealth economy. Within the Region, there will be a one-time

- impact of about \$190 million, supporting about 1,400 jobs and about \$60 million in earnings. Within the Commonwealth, there will be a one-time impact of about \$220 million, supporting about 1,700 jobs and about \$70 million in earnings.
- III. In addition to the economic impacts from upfront construction, the Commonwealth is also expected to gain sizeable tax revenues from construction activity. The Commonwealth will generate about \$5 million in tax revenues from upfront construction alone.
 - IV. Following the fifth year of operations, the proposed facility will generate \$45 million in direct expenditures associated with ongoing operations, which will have a significant impact on the Region and Commonwealth economy. Specifically, within the Region, there will be an annual impact of approximately \$67 million, supporting about 650 jobs and about \$17 million in earnings. Within the Commonwealth, there will be an annual impact of about \$75 million, supporting about 730 jobs and about \$20 million in earnings.
 - V. In addition to the economic impacts from ongoing operations, the Commonwealth is also expected to generate approximately \$2 million per year in tax revenues from ongoing operations of the racino. This comes from expansions in various Commonwealth tax bases from the economic activity generated by ongoing operations, and is in addition to the \$71 million in direct gaming tax revenues.
 - VI. It is estimated that the proposed development will receive 2.91 million visitors per year.
 - VII. An estimated \$104 million per year will be generated by visitors of the proposed development, of which about \$64 million is considered new to the Commonwealth. This spending does not include that which takes place at the racino, but rather are additional dollars spent at other locations.
 - VIII. The Commonwealth is anticipated to generate at least \$3 million per year in additional tax revenues from the in visitation created by the racino.

3,4 & 5 Applicant's Good Faith Efforts to Promote and Ensure Diversity and Equality in Hiring Operations, Outside Vendors and Contractors.

As previously indicated, the day-to-day operations of this project will be under the control of Penn National Gaming, Inc, whose international track-record for success in the promotion and enhancement of minority representation in all aspects of hiring, operations and contracting is second to none. The application of Penn's corporate philosophy regarding the promotion of minority representation will permeate all aspects of this project to ensure the diversity objects of the Gaming Act are not only satisfied but exceed in every aspect.

6. The History and Success of the Applicant in developing Tourism Facilities Ancillary to Gaming Development.

1. Penn National Gaming, Inc.

Penn National Gaming, Inc. (Penn), has extensive gaming experience and gaming facility construction experience in that Penn has been in business since 1972 and has operated Class III casinos since 1997 when it opened its first slot machines at Charles Town Races and Slots in West Virginia. Since that time Penn has expanded the size and scope of its operations so that it now operates 29 gaming and/or racing facilities in 19 different jurisdictions. Additionally, in 2012, the Applicant completed construction and opened three brand new casino facilities, one located in Kansas and two in Ohio. In 2012, combined annual EBITDA (earnings before interest depreciation and amortization) generated by the company's casino and horse racing operations totaled over \$711 million.

Penn has extensive in-house development experience. Penn has a proven multi-year track record of successfully building or renovating first-class gaming facilities on time and within budget. In fact, over the last ten years, Penn has completed (or is close to completing) construction projects valued at over \$3 billion dollars. These projects range from renovations and expansions of existing facilities to green field projects built from the ground up. Penn has been one of the most active regional domestic casino developers over the last four years, building brand new green field casino facilities in Perryville, MD; Kansas City, KS; Toledo, OH; and Columbus, OH. Additionally, Penn National currently has the available financing, market experience and seasoned project development team to get large casino/racing projects financed and built on-time and on budget.

2. Manuel N. Stamatakis

Mr. Stamatakis is the founder, president and chief executive officer of Capital Management Enterprises, a financial services and employee benefits consulting company headquartered in Valley Forge, Pennsylvania. He has gained the reputation of providing clients with expertise from several of the nation's most prominent professionals in the areas of health and welfare consulting services, managed care programs, employee and executive benefits, corporate finance and estate planning and retirement planning.

In addition to creating one of the most prominent financial services and employee benefits consulting companies, Mr. Stamatakis has also been appointed to several key government positions, including Chairman of the Delaware River Port Authority, Philadelphia Shipyard and Development Corporation, PATCO Transit Authority and Team Pennsylvania Ambassador Program, the transition team for Governor Ridge, and the Pennsylvania Supreme Court Investment Advisory Board.

3. Edward Snider

Ed Snider is an iconic entrepreneur and true visionary in the sports and entertainment industry. His emergence as a leader in the Philadelphia sports market began in 1966 when he brought a National Hockey League franchise to the city as the founder of the Philadelphia Flyers. He became the driving force behind the construction of the Spectrum and assumed control of the building in 1971. In 1974, Snider created Spectacor as the management company to oversee the Flyers and Spectrum. Over the next 20 years, Spectacor experienced unprecedented growth, earning national acclaim for its impact in the sports and entertainment business. Under Snider's guidance, Spectacor developed and acquired nearly a dozen related companies.

In 1996, Snider merged Spectacor with the Comcast Corporation to form Comcast-Spectacor. The new venture initially consisted of the Philadelphia Flyers, Philadelphia 76ers, Wells Fargo Center, The Spectrum, and the Philadelphia Phantoms. Comcast-Spectacor then joined with the Philadelphia Phillies to form Comcast SportsNet, one of the highest-rated regional sports cable networks in the country.

Most recently, Comcast-Spectacor developed Global Spectrum, an international facilities management company; Ovations Food Services, an international concessions company; New Era Tickets; and the Flyers Skate Zones. These entities all represent components of Snider's vision: "Take what you do well and grow it."

Through an illustrious career, Snider originated and developed PRISM, the country's largest regional pay television network. He and his son Jay also created one of the nation's first all-sports radio stations, WIP in 1987.

Snider's success and business acumen have been widely recognized by his peers. He was elected to the Hockey Hall of Fame in 1988 and serves on the NHL's Executive Committee. He is a recipient of the Lester Patrick Award for outstanding service to hockey in the United States and has been elected to the US Hockey Hall of Fame, the Pennsylvania Sports Hall of Fame, the Philadelphia Sports Hall of Fame, the Philadelphia Jewish Sports Hall of Fame, the Washington, DC Jewish Sports Hall of Fame, and the Flyers Hall of Fame. In 2005, he received the Greater Philadelphia Chamber of Commerce's William Penn Award, the most prestigious business honor in the region, and the Ellis Island Medal of Honor awarded to Americans of all ethnic backgrounds who have made significant contributions to our society.

4. Peter DePaul

Peter DePaul is the President of the DePaul Group, which is a diversified business organization, with six divisions generating over \$300 million in annual revenues. These divisions include Home Building, Construction, Materials, Health Care and Assisted Living Facilities and Hospitality.

Mr. DePaul was also President of Eagle Downs Racing Association, which operated the Keystone Race Track. The Association, which was sold in 1984, had annual revenues of \$100 million.

Mr. DePaul has served on the Board of Trustees of Temple University, and on the Board of Directors of the Philadelphia Heart Institute of Presbyterian Hospital. In 1995, he was appointed to the Board of Directors of Blue Cross, and served until 2003. Mr. DePaul was Chairman of the Board of Madison Bank, headquartered in Blue Bell, Pennsylvania, until its merger with Leesport Bank in 2004.

5. Thomas Leonard, Esq.

Thomas A. Leonard is a partner with Obermayer Rebmann Maxwell & Hippel LLP. He is chairman of the Litigation Department and a permanent member of the firm's Management Committee.

Mr. Leonard currently serves as chairman of the Delaware Valley Real Estate Investment Fund and Chairman of the Board of Directors of Permalith Plastics. He also serves on the Board of Directors for Independence Blue Cross, U.S. Facilities, Pennsylvania Business Bank, Hahnemann Hospital, The World Trade Center of Greater Philadelphia, The World Affairs Council and CORA Services, Inc. From 1993-98, he served on the Board of Directors for the Federal National Mortgage Association (Fannie Mae).

He currently is chairman and Treasurer of the Casey for Senate Committee. He has also served as the Pennsylvania Finance chairman for President Clinton and as vice chairman, Finance, for the Democratic National Committee. He was also chairman of the Pennsylvania Finance Committee for the Democratic National Committee and chairman of the Ed Rendell for Mayor campaign and a member of the Finance Committee of the Ed Rendell for Governor campaign. He was a delegate to the National Democratic Conventions in 1976, 1980, 1992 and 1996. He was vice chairman of the Philadelphia Gas Commission from 1979-83.

He served as chairman of the Disciplinary Board of the Supreme Court of Pennsylvania. He is a previous delegate to the House of Delegates, Pennsylvania Bar Association, and formerly served on the Board of Governors of the Philadelphia Bar Association. He is chairman of the Board of Governors of Hahnemann Hospital and president of the Board of Advisors of Roman Catholic High School and serves on the Board of Directors of the Irish American Partnership.

Prior to joining Obermayer in 1992, Mr. Leonard was a partner and co-chairman of the Litigation Department at Dilworth, Paxson, Kalish & Kauffman and a permanent member of the Firm Executive Committee. From 1979-83, he served as the controller for the City of Philadelphia.

7. Plan for the Creation of Quality, Living-Wage Jobs and Full-Time Permanent Jobs for Pennsylvania Residence and Residence of the Host Community

ENDEKA ENTERTAINMENT, LP
APPENDIX 38

As previously indicated, it is anticipated that this project will result in the creation of between 1,002 and 1,847 new direct employment opportunities and between 876 and 1,574 new indirect employment opportunities. Please see the chart below, which illustrates these figures:

Phase	Upfront Construction	Ongoing Operations Year 1	Visitor Spending	All Phases
Direct Employment	698	304	0-845	1,002-1,847
Indirect Employment	657	219	0-698	876-1,574
Total Employment	1,355	523	0-1,543	1,878-3,421

Furthermore, the \$64 million in direct expenditures associated with visitor spending attracted by Lawrence Downs will have a significant impact on the Region economy. Within the Region, there will be an annual impact of about \$116 million, supporting about 1,500 jobs and about \$35 million in earnings. These economic benefits will be disbursed throughout a variety of industries in the local community as evidenced by the following chart:

Expenditure Impact within the Region	%	Employment Impact within the Commonwealth	%
Real estate and rental and leasing	27.1%	Real estate and rental and leasing	24.3%
Arts, entertainment, and recreation	23.2%	Arts, entertainment, and recreation	20.9%
Finance and insurance	8.8%	Finance and insurance	8.9%
Professional, scientific, and technical services	7.5%	Professional, scientific, and technical services	7.3%
Health care and social assistance	6.8%	Manufacturing	7.3%
All other industries	26.6%	All other industries	31.3%
Employment Impact within the Region	%	Employment Impact within Commonwealth	%
Arts, entertainment, and recreation	42.9%	Arts, entertainment, and recreation	40.9%
Real estate and rental and leasing	16.7%	Real estate and rental and leasing	14.1%
Health care and social assistance	6.9%	Health care and social assistance	7.2%

Retail trade	6.5%	Retail trade	6.9%
Professional, scientific, and technical services	5.3%	Professional, scientific, and technical services	5.3%
All other industries	21.6%	All other industries	25.6%

Source: Endeka Entertainment (2013), US Department of Commerce (2011), Econsult Solutions, Inc. (2013)

8. Record in Meeting Commitments to Local Agencies, Community-based Organizations and Employees

Although Endeka Entertainment, LP is a newly formed entity, its Principals have an exceptional record of charitable acts, dedication to their respective local communities and are viewed as good corporate citizens. Collectively, the Principals of Endeka Entertainment, LP serve on a variety of charitable, non-profit and public boards throughout the Commonwealth of Pennsylvania, which work to improve the quality of life for our citizens and promote economic growth and opportunity at both the local and state level.

Furthermore, Penn as a licensee of the Pennsylvania Gaming Control Board has demonstrated its ability to satisfy commitments to the PGCB and other state agencies as well as community-based organizations and its employees. Penn's history of satisfying these commitments will be carried through to this project, as Endeka is committed to ensuring a positive working atmosphere with the local community representatives and its employees. Endeka understands that in order to be successful it needs to foster a positive working environment for its employees and to be viewed as a good corporate citizen.

9. Mitigation of Potential Adverse Effects of This Project

Endeka believes that its proposed racing and gaming facility will not have any perceivable adverse effects on the local and surrounding communities. The project is ideally situated to provide easy access from the surrounding highways with ample parking available on the property grounds. (See "Traffic Impact Assessment" prepared by Pennoni Associates, Inc. at Appendix 32) Furthermore, as set forth in the reports of Econsult Solutions, this project will provide tremendous economic growth by way of job creation, increased tax revenues, development of new businesses and increased tourism for the local communities. As such, there should be little to no effect on public health care, child care, public transportation, affordable housing or social services.

10. The Applicant's Record with Compliance regarding State and Federal Labor Laws and its Employees

As the PGCB is aware, Endeka Entertainment, LP is a newly-formed entity without employees and, as such, has not had any issues regarding compliance with either federal or state labor laws. However, if granted a license by the PGCB, all employees of Endeka Entertainment, LP will be treated with the utmost dignity and respect in full satisfaction of all applicable federal and state statutes and regulations.

By way of further response, the Principals of Endeka all have extensive track records of full compliance with all Federal and State labor laws in a variety of businesses which they have operated over the last several decades. This dedication to compliance will continue with Endeka's proposed racing and gaming facility in Lawrence County, Pennsylvania.

APPENDIX 39

**DETAILED DESCRIPTION DEMONSTRATING ADEQUATE FINANCING
FOR THE PROPOSED FACILITY AND TERMS OF
FINANCING INCLUDING PAYBACK PERIOD**

Redacted

Redacted



APPENDIX 41

LETTERS OF REFERENCE FROM LAW ENFORCEMENT AGENCIES HAVING
JURISDICTION IN THE APPLICANT'S AND PRINCIPAL'S MAIN PLACE OF
RESIDENCE AND PLACE OF BUSINESS INDICATING THAT THE AGENCY DOES
NOT HAVE ANY PERTINENT INFORMATION RELATING TO THE APPLICANT OR
ITS PRINCIPALS.

Redacted

APPENDIX 42

LETTER OF REFERENCE FROM GAMING OR CASINO ENFORCEMENT OR
REGULATORY AGENCY IN THE OTHER JURISDICTION, SPECIFYING THE
EXPERIENCES OF THE AGENCY WITH THE APPLICANT, THE APPLICANT'S
ASSOCIATES AND THE APPLICANT'S GAMING OPERATION

Redacted

ENDEKA ENTERTAINMENT, LP
APPENDIX 43

APPENDIX 43

ORIGINAL PAYMENT BOND OR AN ORIGINAL
IRREVOCABLE LETTER OF CREDIT

Redacted

APPENDIX 44

CHART OF EXISTING GAMING SERVICE PROVIDERS

Redacted

APPENDIX 45

**SUMMARY OF ALL PERSONS WHO HOLD AN OWNERSHIP OR OTHER
BENEFICIAL INTEREST IN THE APPLICANT, OR IN ANY OF ITS
PRINCIPAL AFFILIATES OR ENTITIES REQUIRED TO BE LICENSED**

(as of May 31, 2013)

Endeka Entertainment LP

89.99	SDSSL Tuxepo Investors LP
10.00	AHT Land LP
0.01	Endeka LLC
<hr/> 100.00	

SDSSL Tuxepo Investors LP

19.970	Manuel Stamatakis
20.000	Peter DePaul
20.000	Melissa Silver Trust
20.000	Thomas Leonard
20.000	Edward Snider
0.030	SD Tuxepo GP LLC
<hr/> 100.000	

AHT Land LP

0.100	AHT GP, LLC
0.990	American Harness Tracks, LLC
<hr/> 100.000	

AHT GP, LLC

100.000	American Harness Tracks, LLC
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American Harness Tracks, LLC

23.688	Charles Long
7.897	Charles Nannicola
7.897	Frank Nannicola
7.897	Armand Nannicola
6.070	James Carna
6.070	Edward Long
32.987	Christine Biró
6.495	A. William Price
0.999	Steven Lewis
<hr/> 100.000	

Endeka LLC

49.0	Manuel Stamatakis
51.0	Western PA Gaming Ventures LLC
100.0	

SD Tuxepo GP LLC

100.0	Manuel Stamatakis
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Western PA Gaming Ventures LLC

100.0	Penn National Gaming, Inc.
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*Net Ownership Interest in Endeka Entertainment LP
(as of May 31, 2013)*

18.0029	Manuel Stamatakis
17.9980	Peter DePaul
17.9980	Melissa Silver Trust
17.9980	Thomas Leonard
17.9980	Edward Snider
2.3688	Charles Long
0.7897	Charles Nannicola
0.7897	Frank Nannicola
0.7897	Armand Nannicola
0.6070	James Carina
0.6070	Edward Long
3.2987	Christine Biros
0.6495	A. William Price
0.0999	Steven Lewis
0.0051	Penn National Gaming, Inc.
100.0000	

APPENDIX 46

**§1308(C) RESTRICTION ON AN ENTITY SEEKING TO OVERTURN OR
OTHERWISE CHALLENGE A DECISION OR ORDER OF THE BOARD OR
COMMISSIONS FROM APPLYING FOR A CATEGORY 1 LICENSE**

Does Not Apply

APPENDIX 47

**VERIFICATION FROM THE HARNESS RACING COMMISSION STATING THAT
THE APPLICANT HAS SATISFIED THE LICENSE ELIGIBILITY REQUIREMENTS
UNDER SECTION 1302 OF THE GAMING ACT**

See Attached:

1. Exhibit "A" - Order of the Pennsylvania Harness Racing Commission dated October 25, 2012 approving the Stock Transfer from American Harness Tracks, LLC to Endeka Entertainment, LP.
2. Exhibit "B" - March 14, 2013 Letter from George Crawford, Executive Secretary for the State Harness Racing Commission granting an extension until May 31, 2013 to file an application with the PGCB.

**BEFORE THE COMMONWEALTH OF PENNSYLVANIA
STATE HARNESS RACING COMMISSION**

IN RE:

Endeka Entertainment, LP -	:
Application for Approval of Stock Transfer	: Docket No. HAR-END2012-1
From Licensee American Harness Tracks, LLC	:
To Endeka Entertainment, LP	:

ORDER

AND NOW, this 25th day of October, 2012, upon consideration of the Application for Approval of Stock Transfer From American Harness Tracks, LLC ("AHT") to Endeka Entertainment, LP ("Endeka") ("Petition") submitted on August 27, 2012 and the averments contained therein, the Pennsylvania State Harness Racing Commission, consistent with the filing requirements for stock transfer set forth in §204 of the Race Horse Industry Reform Act (4 P.S. §325.204) and §185.13 of the Commission's regulations (58 Pa. Code §185.13) (relating to stock issue or transfers), has completed its review of the Petition and the Endeka License Application (Application for License to Conduct a Harness Horse Race Meeting with Pari-Mutuel Wagering) which seeks approval for the transfer of all stock by and between existing licensee AHT and Endeka.

Based upon its review of the applicable Affidavits, the Multi-Jurisdictional Personal History Disclosure Forms of Endeka's principals, the background investigations and the License Application of Endeka, the Commission, in its judgment, finds that the public interest, the convenience and necessity of the citizens of the Commonwealth, in general, and the best interests of the harness racing industry, specifically, will be served by granting the Stock Purchase between AHT and Endeka.

IT IS ORDER THAT, the Petition by and between AHT and Endeka is hereby **APPROVED**.

In accordance with the provisions of the Race Horse Industry Reform Act ("Racing Act"), all licenses to conduct harness horse race meetings are granted upon the general rights and responsibilities

set forth in the Racing Act, the specific conditions set forth in §209 (4 P.S. §325.209 (b)), and the Commission's regulations, including all Orders previously directed to AHT.

IT IS FURTHER ORDERED THAT, the approval by this Commission is granted subject to the satisfaction of the following conditions:

1. Within 30 days from the date of this Order, Endeka will obtain and provide the Commission fully executed documentation evidencing a firm financial commitment to build a racetrack facility at the previously approved location for not less than \$170 million dollars;

2. Within 30 days from the date of this Order, Endeka will have in place and provide the Commission a fully executed copy of a Management Agreement for the proposed facility.

3. Within 30 days from the date of this Order, Endeka will submit a complete Application for a "Category 1" Slot Machine License with the Pennsylvania Gaming Control Board ("PGCB"). If Endeka fails to obtain a Category 1 slot machine license from the a Gaming Control Board ("PGCB") for whatever reason, the harness license issued to Endeka to conduct harness horse racing meetings, with pari-mutuel wagering shall be automatically and immediately terminated, revoked and surrendered to the Commission without the necessity of any further proceedings or actions of this Commission;

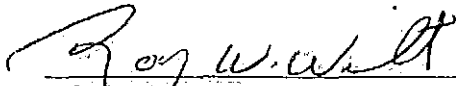
4. Within 60 days from the date of this Order, Endeka will submit a fully executed Live Racing Agreement with a recognized horsemen's group presently operating in the harness racing industry within the Commonwealth;

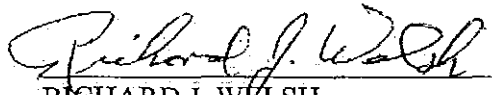
5. Endeka will conduct at least thirty (30) days of live racing in its first year of operation, subject to further review and approval of this Commission;

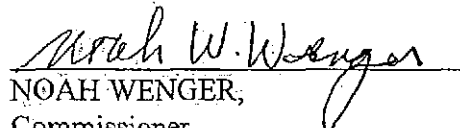
6. Within 60 days from the date of this Order, Endeka will submit a complete summary/update regarding the status of existing zoning/land use approvals, applications, and permits for the project;

IT IS FURTHER ORDERED THAT the Commission hereby delegates to its Executive Secretary the ability to determine the successful satisfaction of the above conditions without need for further Commission administrative action. Such authority shall include, but not be limited to, the right to subsequently amend, modify or remove any restriction, limitation or condition imposed by this Order and to work with representatives of Endeka in the final review, architectural approval and construction of the proposed facility.

BY THE COMMISSION:


ROY W. WILT,
Chairman


RICHARD J. WELSH,
Commissioner


NOAH WENGER,
Commissioner





pa racing

March 14, 2013

James Doherty, III, Esquire
Doherty Hayes, LLC
1000 Bank Towers
321 Spruce Street
Scranton, PA 18503

RE: Endeka Entertainment, LP -
Extension Request - March 13, 2013

Dear Attorney Doherty:

I am in receipt of your letter dated March 13, 2013, filed on behalf of Endeka Entertainment, L.P. ("Endeka"), in which you have provided an update on Endeka's substantial progress towards full compliance with the remaining conditions (Nos. 1-3) set forth in the State Harness Racing Commission's Stock Transfer Approval Order ("Order") dated October 25, 2012. In this letter, you are also seeking to further extend the timeframe for Endeka to satisfy those conditions.

I can certainly understand the level of time commitment, legal details and negotiation, at all levels, necessary to bring this project to fruition. I also appreciate the information regarding ongoing negotiations between Endeka and Penn National Gaming, Inc. ("PNGI") regarding the management of the proposed integrated racing-gaming facility. Reviewing the information provided has given this commission optimism that the project can be completed under the established terms. To that end, in accordance with the authority specifically delegated to me by the Commission's Order, I am hereby granting Endeka an extension until May 31, 2013 to come into full compliance with the enumerated conditions.

Should you have any questions regarding this matter, please advise.

Sincerely yours,

George Crawford
Executive Secretary
State Harness Racing Commission

GC/idm

cc: Commissioners
Mathew Meals, Deputy Secretary - PDA
Jorge M. Augusto, Assistant Counsel

Chairman Roy W. Wilt
Commissioner Richard J. Welsh
Commissioner Noah W. Wenger

APPENDIX 48

STATEMENT DETAILING THE APPLICANT'S REGULATORY HISTORY AS A
LICENSED RACING ENTITY UNDER THE JURISDICTION OF THE HARNESS
RACING COMMISSION, INCLUDING THE APPLICANT'S HISTORY OF
SUITABILITY AND COMPLIANCE WITH THE RACE HORSE INDUSTRY REFORM
ACT IN THE OPERATION OF THE RACE TRACK AND NONPRIMARY
LOCATIONS AND THE CONDUCT OF PARI-MUTUEL WAGERING

Redacted

APPENDIX 49

**DETAILED PLAN FOR THE MANAGEMENT OF ACCOUNTS OPERATED FROM
FUNDS ALLOCATED UNDER §1406 OF THE GAMING ACT**

Redacted



APPENDIX 50

DETAILED PLAN FOR THE MANAGEMENT AND USE OF
BACKSIDE AREA IMPROVEMENT AND MAINTENANCE ACCOUNTS
UNDER §1404 OF THE GAMING ACT

Redacted